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U. S. DEPARTMENT OF INTERIOR

GEOLOGICAL SURVEY, CONSERVATION DIVISION

OFFICE OF THE AREA OIL SHALE SUPERVISOR

In Re:

HEARINGS ON THE DETAILED DE-
VELOPMENT PLAN FOR TRACT C-a.

Auditorium,
1823 Stout Street,
U. S. Post Office,
Denver, Colorado,

Thursday, June 10, 1976.

The above-entitled matter came on for public hear-
ing at 1 p.m., pursuant to notice, James R. Richards,
Director, Office of Hearings and Appeals, presiding.

PANEL:

GERRY SJAASTAD, Deputy Director of Colorado Depart-
ment of Natural Resources.

PETER RUTLEDGE, Area Oil Shale Supervisor, Grand
Junction, Colorado.

ROBERT BOLMER, U. S. Department of Interior, Oil
Shale Environmental Advisory Panel, Bureau of Mines.

CECIL ROBERTS, U. S. Bureau of Land Management,
Energy Minerals Coordinator, Colorado State Office.

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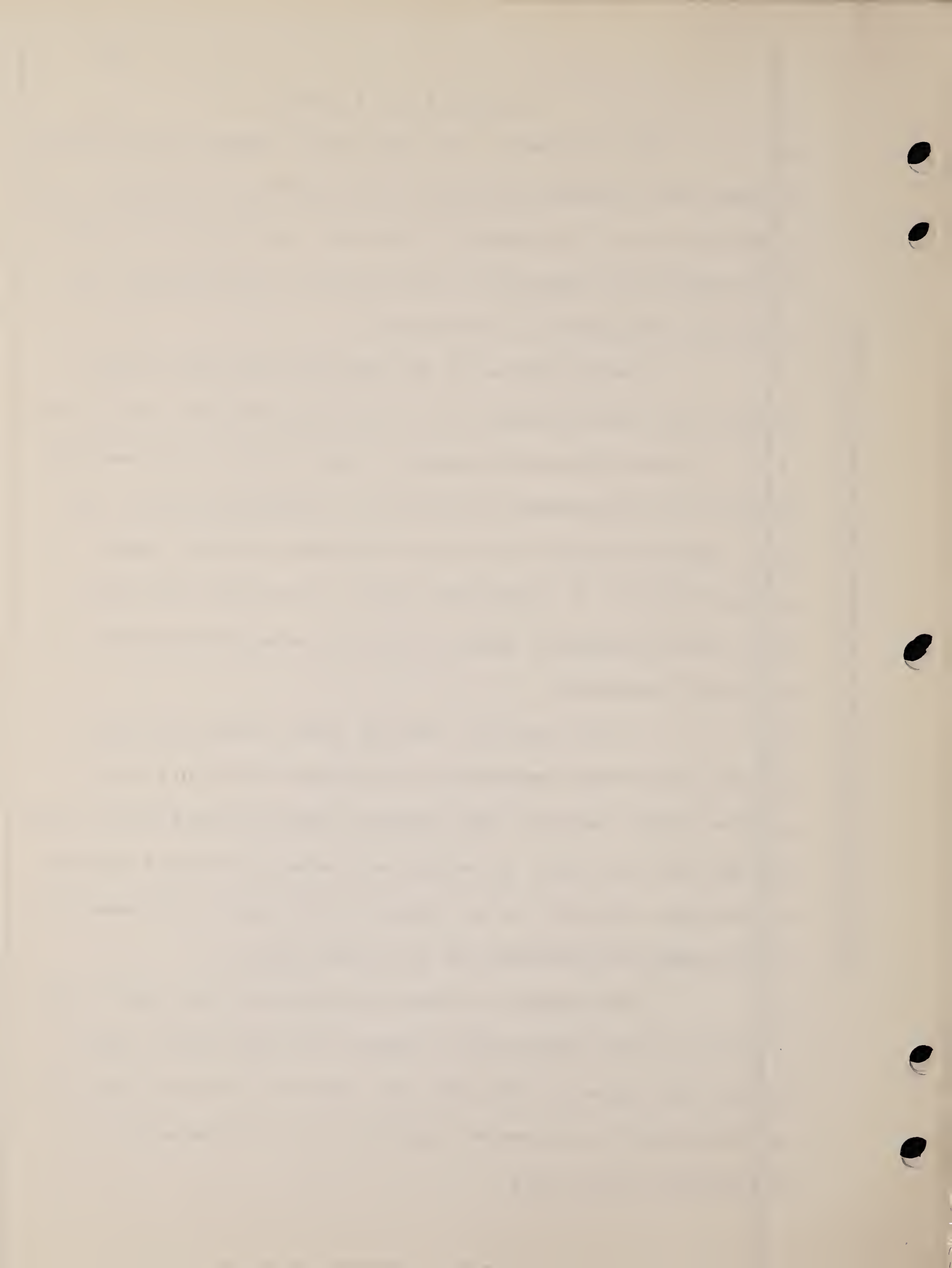
P R O C E E D I N G S

1
2 MR. RICHARDS: Good afternoon, ladies and gentlemen.
3 These are the public hearings on the detailed development plan
4 of Tract C-a. I am James R. Richards, the director of Office
5 of Hearings and Appeals in the Office of the Secretary, the
6 Interior Department in Washington.

7 Seated with me on the panel starting from my far
8 left, Mr. Cecil Roberts who is the Energy Minerals Coordinator,
9 U. S. Bureau of Land Management. Next to him on my immediate
10 left is Mr. Bob Bolmer with the U. S. Bureau of Mines. On
11 my immediate right is Mr. Peter Rutledge, Area Oil Shale
12 Supervisor, U. S. Geological Survey. And on my far right,
13 Mr. Gerald Sjaastad, Deputy Director, Colorado Department of
14 Natural Resources.

15 As you may know, Section 10(a) of the Oil Shale
16 lease under which operations are carried out on Oil Shale
17 lease tracts requires that lessees submit to the Area Oil Shale
18 Supervisor of the U. S. Geological Survey a detailed develop-
19 ment plan, hereafter to be called the DDP, prior to commencing
20 developmental operations on the lease tracts.

21 The lessees of Tract C-a submitted their DDP to the
22 Area Oil Shale Supervisor on March 30 of this year. More
23 than 200 copies of this plan and supporting material have been
24 distributed to interested agencies and individuals and
25 libraries of the area.



2
1 On April 13th of this year, a notice of availability
2 of the plan and schedule of public hearings was published in
3 the Federal Register. Similar notices have been published
4 in area newspapers several times between April 18th and May
5 30th.

6 Public hearings on the environmental provisions of
7 the DDP are required by the lease and are conducted in
8 accordance with provisions of the Code of Federal Regulations
9 which apply to the Department of Interior.

10 The purpose of these hearings is to obtain comments
11 to assist the Area Oil Shale Supervisor in his consideration
12 of the DDP.

13 The verbatim transcript and any supplemental
14 material will be used by the Supervisor in arriving at his
15 decision.

16 These hearings have been scheduled to commence at 1
17 o'clock today and again at 7 o'clock this evening here in
18 this room if there are other witnesses that we don't finish
19 with this afternoon.

20 The hearing record will be kept open for any further
21 written comments until June 25th of this year. All written
22 comments, in addition to comments made here today, should be
23 sent to the Area Oil Shale Supervisor, who happens to be here
24 and his address is 131 North Sixth Street in Grand Junction.

25 As stated in the hearing notice, we ask that indi-

1 individuals testifying limit their presentation to ten minutes.
2 We are not going to be terribly strict about that.

3 I will first call those persons who have previously
4 requested to testify and then I'll offer an opportunity for
5 anyone else present to testify insofar as time permits.

6 These hearings are informational and they are not
7 an adversary proceeding. There will be no cross-examination
8 of those testifying.

9 As is usual in these type hearings, I do have a panel
10 and, of course, their purpose will be to ask any questions
11 that will clarify in nature or any comments they may have on
12 the testimony.

13 In conclusion, a verbatim transcript of the hearings
14 is being made and will be available for inspection at the Area
15 Oil Shale Supervisor's office in Grand Junction, whose address
16 I have previously given, and in the Oil Shale Environmental
17 Advisory Panel office in Building 57, Denver Federal Center.

18 Copies of the transcript for those who may wish to
19 have them may be obtained by making individual arrangements
20 with the court reporter, who is seated down here to our imme-
21 diate left.

22 With those introductory remarks, I will call the
23 first witness that we have on our schedule, Mr. Walter
24 Herget, who is president of the Rio Blanco Oil Shale Project.
25 He will identify himself further. Mr. Herget.

TESTIMONY OF WALTER HERGET

1
2 MR. HERGET: My name is Walter Herget. I am an em-
3 ployee of Standard Oil Company, Indiana, and president of
4 the Rio Blanco Oil Shale Project of Gulf Oil Corporation and
5 Standard. I appreciate this opportunity to comment on the
6 Detailed Development Plan for Federal Prototype Tract C-a
7 which we submitted to the Area Oil Shale Supervisor March 30,
8 1976.

9 The Final Environmental Impact Statement issued by
10 the Department of the Interior just prior to the leasing of the
11 federal oil shale tracts defined Tract C-a as a likely candi-
12 date for open pit mining, above-ground retorting, and off-
13 tract overburden and processed shale disposal. Our studies
14 have shown that approach to have the most promise when evaluat-
15 ing economics and resource recovery.

16 Although a number of economic constraints currently
17 exist, the Detailed Development Plan is not an economic
18 document. Therefore, I will now dwell on that part of the oil
19 shale equation.

20 Our plan for the development of Tract C-a calls for
21 an open pit mining use of the TOSCO II retort, and off-tract
22 disposal of overburden and processed shale in an area adjacent
23 to the tract. Possible use of gas combustion type retorts is
24 also reviewed in the plan. We believe our environmental
25 studies, coupled with our engineering and design work over the

1 past year and a half, support Interior Department approval of
2 our plan. We feel it meets the requirements of the lease and
3 responds to the spirit and intent of the Federal Oil Shale
4 Prototype Program.

5 The DDP for C-a is a plan for modular development
6 of the tract which will lead to 55,000 barrel per day produc-
7 tion of shale oil by 1985. This scale of production is be-
8 lieved to be generally within the range of a reasonable
9 commercial test.

10 The plan we propose starts construction of an initial
11 TOSCO II retort in 1977. Three years later, we would add
12 another. After a total of six years we would scale-up to the
13 55,000 barrel per day operation by the construction of addi-
14 tional retorts and expansion of the mine. Using the schedule
15 outlined in the plan, we would reach this production level in
16 1985.

17 Like the other Federal Prototype Detailed Development
18 Plans, our DDP contains environmental baseline data. The
19 plan covers mining, processing, disposal and rehabilitation
20 functions to the degree that the lease requires and to the
21 degree that we are able to project these operations from the
22 information we have.

23 We consider the DDP to be a living plan which will
24 change as we develop more information. Because of the massive
25 amount of material covered in the plan, we may have some in-

1 consistencies and errors. That does not mean it is not a
2 good document. We believe it is. We hope that the evaluation
3 and review of the Detailed Development Plan and the comments
4 from various sectors of the government and the public will be
5 constructive. We welcome such an evaluation.

6 During the preparation of the plan, we have worked
7 with the office of the Area Oil Shale Supervisor and the
8 Environmental Advisory Panel. We have attempted to answer
9 every question put to us by both, either orally or in writing.
10 We have not always agreed; in some cases, we have had to agree
11 to disagree.

12 In addition to the Area Oil Shale Supervisor and
13 the Environmental Advisory Panel, we have worked with numerous
14 federal, state, regional and community governmental and regu-
15 latory bodies which have jurisdiction over some portion of our
16 activities. The people of these organizations have worked
17 with us in a cooperative and businesslike manner. Again, we
18 haven't always agreed that they have been productive relation-
19 ships. We expect these good relationships to continue.

20 Along with the Detailed Development Plan, we sub-
21 mitted a Social Impact and Growth Statement. This is not re-
22 quired by the lease and is not part of the DDP. It was an
23 effort that both the Area Oil Shale Supervisor and the Rio
24 Blanco Oil Shale Project believed necessary. In addition, we
25 have provided a master plan for growth to the people of Rangely,

1 Colorado, the town we expect to impact the most. The Rangely
2 master plan was developed not for us, but for Rangely. It is
3 under study now by the people of Rangely and Rio Blanco
4 County. That plan also is not required by the lease, but we
5 believe it will be helpful in planning for orderly growth.
6 We tried very hard to avoid being paternalistic in our
7 socioeconomic effort and believe we have succeeded.

8 In addition to the DDP, a number of permits will be
9 required outside of the lease provisions before we can pro-
10 ceed. In some cases, there is pending legislation in
11 Congress to clarify some questions which have come up since
12 leasing, such as the authority of the Interior Department to
13 authorize off-tract use of federal land in connection with
14 the development of the lease. All of these various require-
15 ments will have to be met before we can begin construction.
16 Nevertheless, they do not have to be resolved prior to approval
17 of the DDP. The plan should be approved on its own merit.

18 It must be remembered that oil shale development
19 cannot be meaningfully tested until mines and plants are con-
20 structed and are producing shale oil. The prototype program
21 was perceived to allow orderly development, and that is cer-
22 tainly our intention with the modular approach we have pro-
23 posed. Still we must make a start. Our plan schedule does
24 not project true commercial scale production for nine years.

25 Shale oil, with its enormous western reserves of

1 literally billions of barrels, can well be one of the very
2 best energy investments this country has ever made. Other
3 energy sources will have their time in history when the
4 technology permits. But all forms of energy require long
5 lead time for development before significant amounts of pro-
6 duction are achieved. Shale oil can and should be an important
7 contributor to this nation's domestic energy supply within the
8 next 20 years. We have to get started now in order to develop
9 the industry in a prudent manner which respects the environ-
10 ment. We still have time to do it right if we avoid irrational
11 delays.

12 Therefore, I urge earliest possible approval of the
13 Detailed Development Plan for Tract C-a.

14 Mr. Richards: Thank you, Mr. Herget.

15 Any questions or comments from the panel?

16 MR. SJAASTAD: Mr. Herget, one of the requirements
17 that you have indicated necessary before you can proceed is
18 the off-site disposal and the rationale given in the DDP on
19 selection of off-site disposal refers to economics only in a
20 general way. Has there been a study made to determine what
21 would be the future price or cross penalty that would be paid
22 for double handling the material and if such a study has been
23 made, can it be made available?

24 MR. HERGET: Mr. Sjaastad, we are in the process of
25 making that study now to get the order of magnitude of it, but

1 I believe that the answer will turn out to be in the order of
2 an extra billion to a billion five dollars to move that twice.

3 MR. SJAASTAD: Thank you.

4 MR. RICHARDS: Any other questions or comments?

5 (No response.)

6 MR. RICHARDS: Thank you very much, Mr. Herget.

7 We had Mr. Clark Watson second on the list. Well,
8 here he is. We thought he had a time problem, but I see he
9 has just arrived.

10 Mr. Watson, it is nice to see you.

11 MR. WATSON: Thank you.

12 STATEMENT OF CLARKE R. WATSON

13 MR. WATSON: Excuse me for being slightly late.
14 There is quite a lot of tie up.

15 Gentlemen, once again I thank you for providing
16 this opportunity for citizens to comment on detailed develop-
17 ment plans for the mining of oil shale in the Green River
18 formation. My name is Clarke Watson and I am chairman of the
19 Colorado Black Political Caucus. In business I serve as
20 general manager of the Westland Companies and president of its
21 subsidiary, Watson Associates.

22 It is in the latter capacity that I began to develop
23 expertise in the field of energy. For the past three years
24 Watson Associates has concentrated nearly 95 per cent of its
25 business activity learning about energy problems, energy re-

1 sources, energy and environmental questions and has attempted
2 to translate this knowledge in a manner that can serve people
3 from all walks of life.

4 On one or two occasions our clients have been staunch
5 environmentalists. Usually, however, our clients have been
6 energy companies. But our relationship has been one where
7 industry has provided information and asked for our conclu-
8 sions and independent of industry we seek input from academia
9 and the public in general so that as a responsible company
10 providing what we believe to be the best information avail-
11 able our conclusions reflect data that can serve the great-
12 est amount of people in economically viable ways without de-
13 stroying our eco-systems, but more importantly keeping the
14 needs of human kind in proper perspective.

15 It is not enough to possess this knowledge, how-
16 ever, and not share it whenever and whomever possible. Thus,
17 for the first time since its creation, the Colorado Black
18 Political Caucus has been able to focus on more than just
19 the so-called "traditional" problems of social upheaval and
20 civil rights. My responsibility has been to educate members
21 of the Caucus on energy matters and to solicit sentiments
22 thus formed as a result of the knowledge provided.

23 On Friday, June 6, the Colorado Black Political
24 Caucus met and unanimously endorsed a policy of sound and
25 continued development of our mineral resources without delay.

1 One such program that falls well within the parameters of
2 this policy is the proposed development of Tract C-a in Rio
3 Blanco County. We feel it meets the test of soundness, ad-
4 vances the cause of greater energy independence, speaks to
5 our pressing economic needs and in this rare instance could
6 possibly leave a geographic area in better shape post-develop-
7 mentally than it was in its predevelopment stage.

8 I will take up three separate considerations that
9 support this hypothesis, economics, that being environment and
10 energy independence.

11 Let us begin first with economics. The price of
12 oil in the United States, as I'm sure we are all aware, al-
13 though currently artificially controlled, has a direct rela-
14 tionship to the overall economic mix. As overall prices rise,
15 so do petroleum products, accordingly drops in prices are
16 likewise reflected. The key element here is the relationship
17 to the price of other goods and services. But if this vital
18 resource, fossil fuel, upon which we are, for better or for
19 worse, heavily dependent, if this resource became in short
20 supply domestically and we were forced to pay unreasonable, un-
21 related prices abroad then the whole economic fabric of the
22 United States could be seriously rent.

23 So we must turn to our indigenous sources of supply,
24 and we must develop them where they exist. This is what Rio
25 Blanco proposes to do. It proposes to develop a commercial

1 synthetic fuel industry that can provide by some estimates
2 as much as 5,000,000,000 barrels of oil during the lifetime
3 of extracting and processing the shale formations beneath
4 Tract C-a. This sort of consideration speaks to the desired
5 stability and predictability upon which sound economy depend.

6 Now let us take a more personal approach to what
7 development of Tract C-a means to the citizens of Colorado.
8 At Page 2-1-10 of the Project Background and Executive
9 Summary, we did find that Rio Blanco Oil Shale Project em-
10 ployment during Phase I will be about 700 for construction,
11 300 for Stage I operations and 500 for Stage II operations.
12 Phase II construction employment will peak at about 2,200
13 while the Phase II operating force will total about
14 1,100 permanent employees. Overall, Rio Blanco Oil Shale
15 Project employment is expected to peak at 2,700 during the
16 period from mid 1985 when both Phase I-Stage 2 operations
17 and Phase II construction are underway.

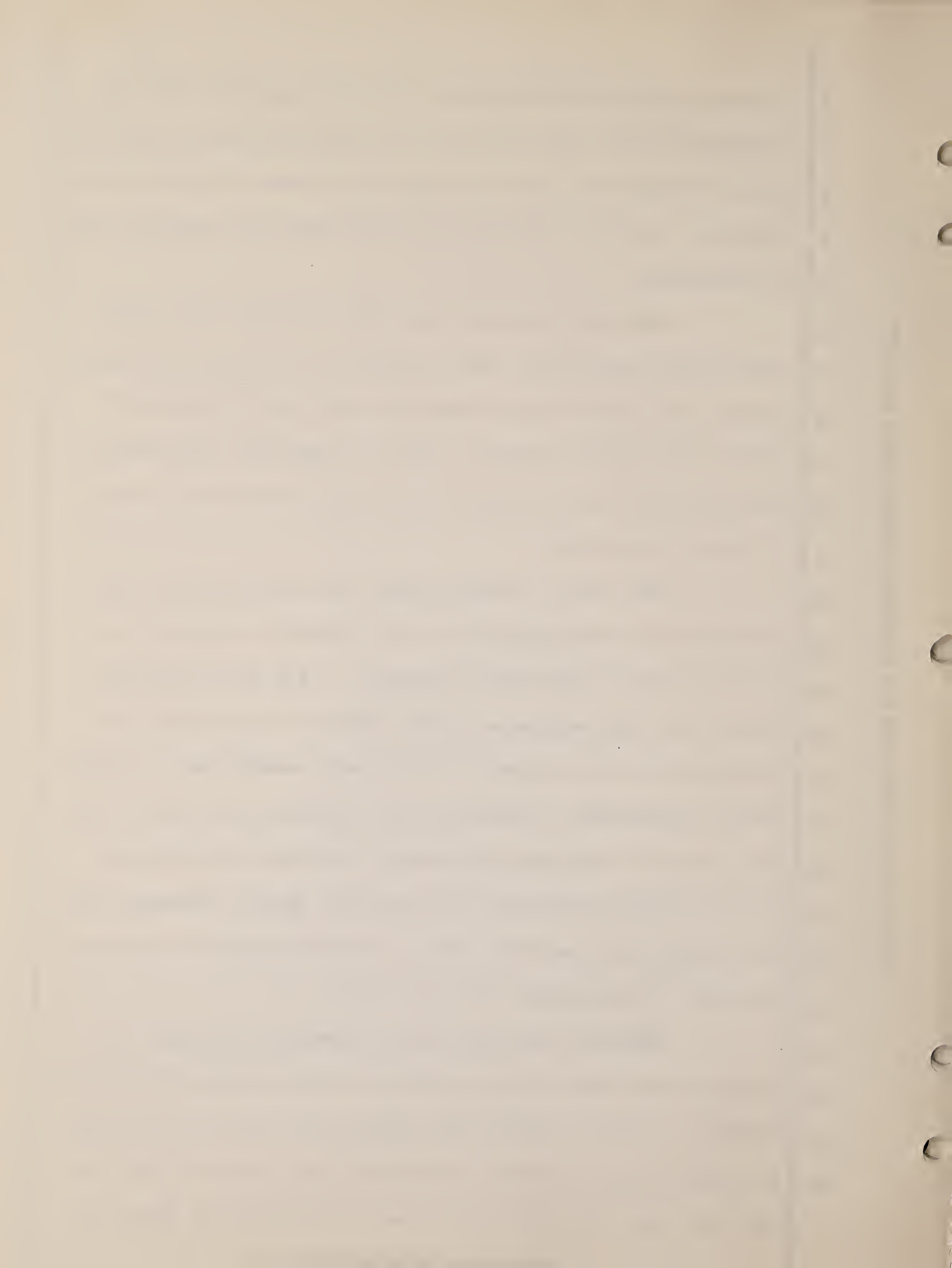
18 One thousand one hundred permanent jobs on the
19 Western Slope means we can abate the tendency of youth out
20 migration, which has been a historic problem on the western
21 communities, and also provide jobs for many now locked job-
22 less and hopeless in urban centers. Indeed, at Page 4-9 of
23 the Social and Economic Impact Statement, Rio Blanco Oil
24 Shale Project desires to hire from Colorado the unemployed,
25 underemployed and those unemployable because of

1 a lack of skills and education. In this instance, the de-
2 velopment of oil shale can act as a positive social impact to
3 all of Colorado by removing people from costly social welfare
4 programs, thereby, resulting in a net human and economic gain
5 for Colorado.

6 With this spread, with this reaching into front
7 range urban centers for labor resource, Rio Blanco Oil Shale
8 Project very specifically addresses the state's expressed
9 goal of dispersed economics. What a tremendous opportunity
10 this provides for the state to put into action what it has
11 so long articulated.

12 Now, then, looking toward the environmental con-
13 sideration of developing Tract C-a, probably the most im-
14 portant issue is off-tract disposal. I say most important
15 issue since the hardness of the Flora and Fauna that are
16 indigenous to the region is fairly well established. Revege-
17 tation, protection of species and a general upgrading of the
18 eco-system is intrinsic throughout the entire process be-
19 ginning with the regional Environmental Impact Statement and
20 concluding with the DDP. What remains at issue is off-tract
21 disposal of overburden and spent shale.

22 Several sites have been suggested including the
23 Douglas Creek area in the shadows of the Cathedral Bluffs and
24 84-Mesa. I took a field trip earlier this week to the tract
25 in order to gain a visual perspective and a better sense of
feel for what the options were and my conclusions based on



1 that visit were that the Douglas Creek area is very pleasing,
2 at least more pleasing than much of the terrain and character-
3 istic of the Piceance Creek basin.

4 Once on 84-Mesa, I was struck by its aridness,
5 its tangled vegetation, its parched and dusty state. It
6 was as if Dante had misplaced his inscription, "All hope
7 abandon ye who enter here", for this place was indeed most
8 logical for such a forboding message. But then I thought
9 this place could be nature's invitation for man to reverse
10 some of his past mistakes. It is known that we have reduced
11 once pastoral settings to ravaged, dust-choked terrain.
12 Now, it seems an opportunity exists to repay some of these
13 past misdeeds by replacing this neglected acreage with
14 grasses instead of sagebrush, replacing that which has
15 doubtful value from any perspective with that which could
16 enhance the area, encourage more and perhaps new species of
17 Fauna and contribute to man and his environment.

18 Of course, on a more sober note, we have to con-
19 sider the inextricable economics of off-site disposal. Finan-
20 cial estimates reflect considerable costs per mile. It is
21 eight to ten miles to the Cathedral Bluffs area versus
22 approximately one mile to 84-Mesa. When considering Douglas
23 Creek, each of us has to ask, "Do any of us, as responsible
24 citizens, want to add this cost to the public, to the con-
25 sumer, when such an economically reasonable alternative ex-

1 ists?" I would think not. So beyond the opportunity to up-
2 grade the quality of 84-Mesa is the additional attraction of
3 maintaining reasonable costs to the public which will ulti-
4 mately buy the roducts of synthetic fuels. 84-Mesa seems,
5 when considering the alternatives, the best solution for
6 off-tract disposal.

7 In conclusion, a brief comment once again about en-
8 ergy independence. Recent years have seen environmental pro-
9 tection and deliberations regarding the same take precedence
10 over human factors such as supply and demand, employment,
11 existing technology and global affairs and I think a perfect
12 example of this type of prioritizing is evidenced in the re-
13 quirements of the C-a lease. While minute attention to the
14 environmental milieu is a matter of law, vis a vis 30 CFR
15 Part 231 and 43 CFR Part 23, consideration of the human
16 factors is not.

17 How we arrived at such a strange epoch in American
18 history where management of human needs becomes overshadowed
19 by environmental factors is beyond the comprehension of my
20 limited experience. However, I hasten to add, we mustn't
21 ignore the environment but if we as American citizens weaken
22 ourselves to the extent that we cannot even protect and
23 maintain that environment we love so dearly, somehow logic
24 seems to elude the process.

25 I believe that we must finally bear in mind that

1 our introduction to terra firma is still in its infant stage.
2 Accordingly, we continue to behave somewhat childishly to-
3 wards each other. More often than not, like a child peeved
4 at his playmate we strike out with our fists when we are dis-
5 satisfied with a neighbor's act. Hence, the Middle East,
6 conflict in Africa and Ireland, rumblings in the Panama
7 Canal Zone, continued friction along the Manchurian border,
8 in short, far too much instability for this nation to enter-
9 tain achieving world peace overnight.

10 So, we feel until we mature to a better, more de-
11 sirable state, we must face up to the world in current terms,
12 with current resources and hope that the age of solar and
13 other more sophisticated forms of energy is also an age of
14 peace. When we progress, it must be on all fronts. We feel
15 shale and shale development along the tract of C-a is one of
16 the resources of the near future and as a resource it can move
17 us toward even better energy alternatives and hopefully as we
18 approach that era we will have progressed in our human
19 affairs as well.

20 Thank you.

21 I now entertain any questions.

22 MR. RICHARDS: Any questions or comments from the
23 panel?

24 (No response.)

25 MR. RICHARDS: Thank you. It was, as last time,

1 informative and we appreciate your coming.

2 MR. RICHARDS: Hilary Wendt with the Wild Horse
3 Organized Assistance. Ms. Wendt is not--

4 MS. WENDT (interrupting): Yes, I am here.

5 STATEMENT OF HILARY WENDT

6 MS. WENDT: Gentlemen, I have been contacted by
7 another organization that I am not representing and I have
8 been asked to add their testimony also and I request the
9 permission to do so.

10 MR. RICHARDS: Yes, that is sufficient.

11 If you will have a seat right over there.

12 The testimony that you wish to add, does it, in
13 effect, duplicate yours or is it supplementary?

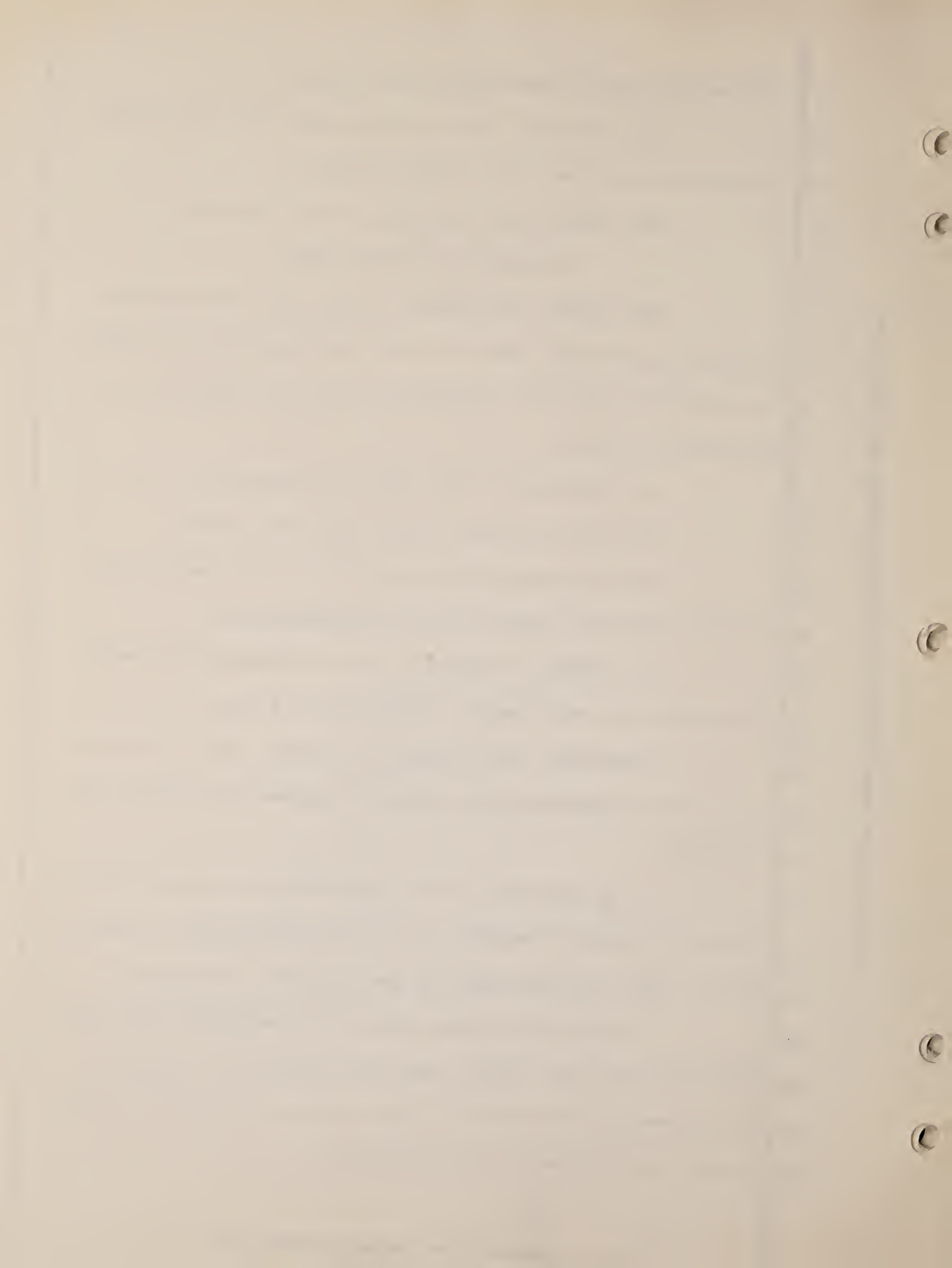
14 MS. WENDT: Basically, it is Friends of Animals,
15 Inc. and it is very short. I'll read it first.

16 Statement of Friends of Animals, Inc. in connec-
17 tion with the proposed Oil Shale Development for Tract C-a,
18 Colorado.

19 I am grateful for the opportunity to tesify on be-
20 half of Friends of Animals, Inc. and thus give the organiza-
21 tion's views as they apply to the proposed development.

22 Friends of Animals, Inc. is dismayed by the negli-
23 gent attention that both Shell and Ashland Oil Companies
24 have given to the welfare of the variety of species present
25 in the area proposed for development.

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1 We respectfully request that Ashland and Shell Oil
2 Companies' proposals be rejected on grounds of insufficient
3 provision for the welfare and well-being of the animals in-
4 habiting Tract C-a. Respectfully submitted for Friends of
5 Animals, Inc.

6 MR. RICHARDS: Yes, Ms. Wendt, I think they had
7 reference to Tract C-B. We are now on Tract C-a, which is
8 Standard and Gulf.

9 MS. WENDT: I'm sorry, I meant Tract C-a.

10 This is the statement of Wild Horse Organized
11 Assistance, Inc. in connection with the proposed Oil Shale
12 Development for Tract C-a, Colorado.

13 Again, thank you for the opportunity to appear here
14 before you on behalf of Wild Horse Organized Assistance, Inc.
15 to present the organization's views as they apply to the pro-
16 posed development.

17 WHOA! is committed to the welfare of wild horses
18 and burros on the public land, now required by law to be con-
19 sidered as an integral part of the natural system of the pub-
20 lic lands in cooperation with the federal agencies in the
21 carrying out of the provisions of Public Law 92-195.

22 Since wild horses and burros are to be managed in
23 a manner to achieve and maintain a thriving natural ecological
24 balance with other public land use, we respectfully request
25 that their welfare be kept in mind and that your recommenda-

1 tion concerning the proposed development be aimed toward that
2 goal. We have grave concerns over the commercial over-ex-
3 ploitation and energy development that has, in many instances,
4 caused irreparable damage to our public land resource. We
5 look to you for wise recommendations that will: One, result
6 in curtailment of commercial over-exploitation. Two, give
7 greater consideration to public values than to the short
8 term economic advantage of profit seeking individuals or
9 concerns. Three, limit energy exploration and development
10 to a minimum of disruption to the environment.

11 Hundreds of letters have been directed to Inter-
12 national Society for the Protection of Mustangs and Burros,
13 an organization under the same executive leadership as WHOA!,
14 in which the writers have expressed their interest in the
15 favorable consideration of the welfare of wild horses and
16 burros in the decisions concerning public land use. The
17 files of our organization are available for an inspection of
18 these letters should you desire to do so.

19 Respectfully submitted, Hilary Wendt, for Wild
20 Horse Organized Assistance.

21 MR. RICHARDS: Thank you, Ms. Wendt.

22 Any questions or comments from the panel?

23 (No response.)

24 MR. RICHARDS: I had a question occur to me, Ms.
25 Wendt. Do you have some evidence or finding that there are

1 wild horses and burros, for example, on this tract or nearby?

2 MS. WENDT: Yes, sir, we do. One is the Bureau of
3 Land Management report on the White River Resource Center,
4 Craig District, Colorado. Also there are numerous eyewitness
5 sitings of three herds of wild Mustangs.

6 MR. RICHARDS: And your point would be that the
7 development--

8 MS. WENDT (interrupting): We think it would dis-
9 rupt their migrating pattern.

10 MR. RICHARDS: Do they migrate through this area?

11 MS. WENDT: Yes, they do, to receive more area for
12 forage, and I believe in the report itself it says that there
13 are approximately 143 horses in Piceance Basis, 57 in the
14 area south of Rangely.

15 MR. RICHARDS: That is from the BLM report?

16 MS. WENDT: Yes, it is.

17 MR. RICHARDS: Do they deal with or treat the
18 effect on the wild horse and burro herds of Tract C-a?

19 MS. WENDT: No, they don't. This is our own state-
20 ment concerning that.

21 MR. RICHARDS: Is there anything in the detailed
22 development plan that you read that you feel enters with this
23 factor?

24 MS. WENDT: Not effectively, no.

25 MR. RICHARDS: Or the socio-economic survey?

1 MS. WENDT: No.

2 MR. RICHARDS: Thank you.

3 Ms. Peggy Rector, Rangely Board of Trustees.

4 STATEMENT OF PEGGY RECTOR

5 MS. RECTOR: My name is Peggy Rector and I am a
6 member of the Board of Trustees for Rangely, Colorado. I
7 have been a resident of Rangely for 13 years. My husband is
8 a descendant of one of the first homesteaders in Rangely.

9 As most of the materials in the Detailed Develop-
10 ment Plan for Rio Blanco Oil Shale Project are technical, my
11 comments will cover only a small portion of the DDT.

12 The residents of Rangely, Colorado, recommend that
13 the road from Tact C-a to Rangely be constructed as Rangely
14 is desirous their employees live in our community. The road
15 would also conserve energy as there would be fewer miles for
16 employees to drive to and from work. With the fewer miles
17 to drive, there is less possibility for accident. If this
18 road were constructed, the total miles from Rangely to C-a
19 tract would be 22 miles. At present to get to the site from
20 Rangely is 77 miles.

21 Rangely was once a town of over 4,000 people. We
22 are now a town of 1,700 residents and would like to grow back
23 to the 4,000 and get larger. Rangely survived the impact
24 of the oil boom days for 1945 and while we are concerned, we
25 are not afraid of the possible impact. We are, in fact, pre-

1 paring for it. Both our water and sewer systems are being
2 upgraded and expanded to handle a population of up to 5,000.
3 The recreational district has also been formed. The tax-
4 payers recently passed a bond issue for \$1.2 million for con-
5 struction of the recreational facility. This facility will
6 include an indoor-outdoor swimming pool, racket ball court,
7 tennis courts and other facilities. This recreational
8 center is scheduled to be in operation by fall of 1977.

9 We in Rangely also recommend that Tract C-a be per-
10 mitted to lease off-site lands for the plant construction,
11 overburden and spent shale disposal which will enable
12 greater resource recovery. The Rangely Board of Trustees
13 have written letters to the Colorado Congressional delega-
14 tion recommending passage of this necessary legislation. The
15 Rangely Board of Trustees have also written our Congressional
16 delegation recommending modification of the clear air laws to
17 permit Rio Blanco and the shale industry to operate using
18 the best proven technology.

19 The Rio Blanco Oil Shale Project representatives
20 have been very cooperative with us in Rangely. They have pro-
21 vided us with assistance which we would not have been able to
22 get on our own. Representatives from the Foundation of Urban
23 and Neighborhood Development, FUND, have worked to get the
24 residents input in Rio Blanco Oil Shale Project's plans.
25 Gulf Oil Real Estate and Development Company, GOREDCO, is

1 preparing a master plan to help us plan for Rangely's future
2 growth. We have not agreed with all of their recommendations
3 but do appreciate their assistance and believe that we will
4 have a workable plan by the time we finish. The industrial
5 relations department for Morrison-Knudsen Company, Inc.
6 made a housing and employment survey, which has been helpful
7 to many in our business community.

8 An advisory group of ten Rangely citizens was
9 formed to keep the citizens advised of plans for Tract C-a
10 and to advise Rio Blanco Oil Shale Project of the community
11 reactions to their plans.

12 Overall, we have enjoyed a good working relation-
13 ship with the Rio Blanco Oil Shale Project management and
14 are confident that they will continue to cooperate with our
15 town government as they continue their efforts to develop
16 the oil shale resources in our area. The present Town
17 Council will do everything within its power to accommodate
18 new growth and further relations with GOREDCO for the benefit
19 of Rangely and surrounding areas.

20 Thank you.

21 MR. RICHARDS: Thank you, Ms. Rector.

22 Any questions or comments?

23 (No response.)

24 MR. RICHARDS: Thank you very much.

25 Ms. Wilma Winn who is a citizen from Rangely.

STATEMENT OF WILMA WINN

MS. WINN: I am a retired teacher and I have lived in Rangely 48 years, retired teacher 28 years in Rangely, speaking in favor of the development of oil shale. The ideas and impressions expressed are my own.

Rangely was founded in 1880 as a trading post. Before 1944 there were approximately 100 residents and, behold the oil boom. Total population for the area was in excess of 4,000 before the boom turned into something resembling a bust. At first, Rangely staggered, then recovered its balance and settled down to building a more stable town.

The citizens of Rangely are proud of the accomplishments made in 30 years. Many things have been made possible with sheer determination and imagination. I was there in Governor Knous's chambers in 1946 when Rangely School District asked the state for help. The meeting resulted in a filibuster. The school district then bonded itself and sold the bonds to furnish education for the expanding population. After that we began to create special districts within districts for taxing purposes in order to acquire a junior college, hospital and clinic, a fire department, sanitation and a newly formed district for recreation. The modern library is supported by the school district with a special signed petition from taxpayers.

Today Rangely faces a future with strong optimism.

1 We have closely followed the historical development of the
2 potential of oil shale. We are the closest town to the C-a
3 tract. Citizens support the road into the site. We welcome
4 new residents. A newcomer is a stranger yesterday and be-
5 comes quickly integrated into the mainstream to become a
6 contributing member of the social structure. Most citizens
7 agree, we have met the challenge before and are better pre-
8 pared to accommodate growth now than at any time previously.

9 Mr. Dick McElroy, community affairs representative
10 with Rio Blanco Oil Shale Project, has been coming to
11 Rangely for two years. He attends Chamber of Commerce meet-
12 ings, City Council planning sessions. He has organized and
13 meets with an advisory group once a month. He was our first
14 contact with the proposed project and has been helpful in
15 keeping the citizens informed of the progress on C-a tract.

16 Gulf and Standard helped fund the James M. Bowers
17 Rio Blanco County plan, Rangely used Bowers for their first
18 planning effort. The change was made to Gulf Oil Real Estate
19 Development Company in July 1975 after Rio Blanco Oil Shale
20 Project offered to retain them to act on behalf of the town.
21 There have been public meetings to obtain local input. The
22 plan is being prepared to incorporate expressed views and
23 needs. Revisions were suggested and are being made before
24 final adoption. The plan is to serve as a guide in dealing
25 with the physical growth as it occurs.

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1 FUND, Foundation for Urban and Neighborhood De-
2 velopment, was retained by Rio Blanco Oil Shale Project in
3 February 1975 to develop data concerning local attitudes and
4 desires pertaining to growth associated with oil shale. The
5 results found Rangely ready, willing and able to expand as
6 needed. The people sent in by FUND were very helpful,
7 courteous and observant. They were diligent workers and we
8 would like to keep them here.

9 We want oil shale developed because there is a
10 need now. We feel it is a chance for our town to realize some
11 benefits such as employment of youth, a larger airport,
12 better transportation, improved shopping and so forth. Also,
13 due to the revised operating methods in the present oil
14 field, we are seeing a decrease in the number of workers. Oil
15 shale could fill a void at this time.

16 We support 84-Mesa because the plan has been
17 thoroughly researched and we feel it will not harm the en-
18 vironment.

19 I thank you.

20 MR. RICHARDS: Thank you, Ms. Winn.

21 Any questions or comments from the panel?

22 (No response.)

23 MR. RICHARDS: Thank you very much for coming over.

24 Mr. Allen Stokes of the Sierra Club.

25 STATEMENT OF ALLEN W. STOKES, JR.

1 MR. STOKES: I am Allen Stokes, an attorney with
2 the Sierra Club of Denver and I give these remarks of the
3 Enos Mills Group, that is the Denver group of the Sierra Club.

4 I might mention before I start that I have about
5 ten extra copies of my remarks and I will leave them here
6 for the people who can pick them up if they want.

7 MR. RICHARDS: Fine, if you would leave them on the
8 reporter's table.

9 MR. STOKES: The Enos Mills Group of the Sierra
10 Club opposes the use of land outside Tract C-a, such as the
11 Mesa 84 site, for processing facilities of spent shale dis-
12 posal and other ancillary uses. The C-a tract least is
13 part of the federal prototype leasing program and is thus
14 intended to operate at an experimental as opposed to a full
15 scale commercial level reaching as high as 300,000 barrels
16 per day as suggested in the Detailed Development Plan. It is
17 thus appropriate that the entire operation be contained within
18 the lease. Even locating the spent shale and retorting
19 facilities on site, there will be sufficient oil shale re-
20 sources to allow satisfactory completion of the prototype
21 program. It is not necessary to open-pit mine the entire
22 eight square mile lease to determine the environmental and
23 economic feasibility of oil shale development.

24 The Sierra Club finds rather presumptuous a Detailed
25 Development Plan which is based on use of off-site land.

1 Such land is not now available under the Mineral Leasing
2 Act which prohibits operations to 5,120 acres, the approxi-
3 mate size of the lease. The DDP is premised on passage of
4 federal legislation. Clearly it is illegal or certainly
5 improper for Interior to approve this DDP prior to the
6 passage of the required law.

7 Interior should not approve this DDP because the
8 plant will emit sulfur oxides at levels which will on occasion
9 cause Colorado's ambient SO₂ levels to be exceeded. Disper-
10 sion modeling conducted by lessees shows SO₂ emissions under
11 Phase I will violate Colorado's three-hour ambient standard
12 and operations under Phase II levels will violate both
13 Colorado's three hour and twenty-four hour ambient standards
14 in portions of the Piceance Basin. This is not a continuous
15 violation but on occasion, according to the company's
16 monitoring. Such pollution levels, particularly in combina-
17 tion with other pollutants, may cause injury to plant life
18 and will impair the present clean air of the Basin.
19 Section II of the lease requires operations to comply with
20 federal and state air pollution laws as well as other laws.
21 Therefore, Interior should not approve the DDP until the
22 lessees agree to install air pollution control equipment suffi-
23 cient to prevent ambient SO₂ violations or until the current
24 standards are weakened by the Colorado Air Pollution Control
25 Commission, preferably the former will occur.

1 The DDP recognizes that increased traffic will
2 cause increased road kills of deer and other wildlife. The
3 DDP does not, however, explore the possibilities of the
4 companies' providing transportation by bus, for instance,
5 and making its use mandatory for workers. This would
6 eliminate much traffic, reduce wildlife mortality as well as
7 air pollution and save energy. Since most workers will be
8 commuting from a few towns, perhaps mostly from Rangely, this
9 scheme should be practical and convenient for the workers.

10 The DDP, while explaining the process used to
11 select the 84-Mesa site for off-site disposal, does not de-
12 scribe the environmental impacts to result from use of each
13 alternative. The DDP refers to the underlying evaluation study
14 entitled Environmental Evaluations of Proposed Disposal
15 Sites, Tract C-a, dated August 1975. This study does not
16 significantly elucidate the environmental impacts. Only
17 cursory discussion is given to wildlife impacts and the
18 dominant vegetation types. The various impacts on each tract
19 are rated by numbers representing severity of impact thereby
20 allowing comparison for any particular parameter with the
21 same impact on an alternative tract. This system does not pro-
22 vide a description of the impacts, thus allowing independent
23 comparison of the various tracts. The underlying data is not
24 contained in the study. The analysis does not make clear, for
25 instance, why 84-Mesa is considered environmentally superior

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1 to all other disposal sites despite the existence of 30
2 greater sandhill cranes which could be disturbed. These
3 cranes were spotted during the two migration seasons in 1975
4 although they were not sighted this spring. It is still
5 cause for alarm if they use this site on a periodic basis.
6 I might say in regard to this study that it is a good
7 attempt, I think, to try to compare in the past of the
8 various alternative sites by use of a numbering system to
9 allow ready comparison. But at the same time, a reader has
10 to go on the faith and credibility of those who prepared the
11 report and the underlying environmental information is
12 lacking.

13 The DDP proudly proclaims numerous actions which
14 Gulf and Standard Oil plan to take to reduce environmental
15 harm. These efforts and promises are to be commended. They
16 should, however, be reduced to binding obligations included
17 in the DDP approval document. This procedure should not be
18 onerous for the companies if they do intend, as I presume,
19 to follow and may be of great benefit to the environment.

20 Finally, if Interior approves this DDP, approval
21 must only be given after the Department prepares an environ-
22 mental impact statement pursuant to NEPA. The EIS prepared
23 for the prototype oil shale leasing program is not adequate to
24 describe impacts to result from development of Tract C-a.
25 That EIS, prepared in August 1973, almost three years ago,

1 did not benefit from the greatly increased understanding of
2 the environmental impacts of oil shale development which
3 have been discovered through numerous subsequent studies.
4 These studies should be synthesized as they pertain to
5 Tract C-a and become a basis for an impact statement prepared
6 on the DDP. Also the mining plan as discussed in the DDP
7 varies from that envisioned in the EIS for the prototype
8 program. That EIS foresaw dumping of spent shale in Water
9 Gulch west of the tract rather than on the Mesa 84 site. It
10 also predicted that backfilling of the open-pit mine could
11 begin 16 years after operations began as opposed to the 30
12 years projected in the DDP. The EIS calculated environmental
13 impact based on widening of the existing dirt access road,
14 not on a new road being built from Rangely. The EIS calcu-
15 lated that all air pollution laws would be met and calcu-
16 lated impact on the environment accordingly. The EIS in
17 1973, therefore, did not recognize that Colorado's ambient
18 SO₂ standards would be violated and thus did not calculate
19 impacts to arise therefrom. These are some of the important
20 differences between the project as envisioned in the proto-
21 type statement and that which is now planned.

22 Thus, it is inappropriate for government decision
23 makers to rely on the EIS for the prototype leasing and
24 obviously only the Detailed Development Plan the company's
25 to approve this DDP.

1 Thank you.

2 MR. RICHARDS: Thank you, Mr. Stokes.

3 Any questions or comments from the panel?

4 (No response.)

5 MR. RICHARDS: Mr. Stokes, I have one question
6 that occurred to me. I noticed that you were remarking about
7 the highway to the tract and were you suggesting that the
8 Department of the Interior could impose as a condition to
9 approving the DDP that certain people could only travel by
10 bus on the state highways? Was that the thrust of what you
11 were saying?

12 MR. STOKES: Well, I think that it would be greatly
13 beneficial if the companies would voluntarily supply some
14 form of mass transit and make this available to their em-
15 ployees. I think the Interior would have the power to require
16 this as a condition of going across BLM land and an overall
17 condition on this permit.

18 MR. RICHARDS: Do you think a state highway ease-
19 ment conditioned upon only using buses for the state highway?

20 MR. STOKES: Well, I think the state road is
21 essentially to aid a private development and if we are
22 talking about legality, I think the Department does have the
23 authority to require that the company make some sort of a
24 mass transit available to its employees. I think this would
25 cut down road kills greatly, probably cut down dust, certainly

1 save energy and might make this project a little bit more
2 worthwhile.

3 MR. RICHARDS: Those are hopeful goals and I was
4 just wondering about the legality of it upon using a state
5 highway.

6 MR. STOKES: I haven't researched that. I think
7 the Interior has, perhaps, some authority over whether that
8 is built or not and certainly a lot of authority over what
9 actions the company state will alleviate the Environmental
10 Impact Statement resulting from C-a development.

11 MR. RICHARDS: Thank you.

12 Any other questions?

13 MR. RUTLEDGE: Yes, Allen, you mentioned it was
14 your opinion that the Department shouldn't approve a
15 Detailed Development Plan until, at least in this case, until
16 specific authority is available or given for the off-site
17 disposal envisioned here in this plan. Do you believe this
18 is only one of the areas where we might call outside permits
19 or right of way, granted right of ways? Many other permits
20 are required. Now, they have outlined what has been required
21 in the DDP. Do you believe that the Department should not
22 approve that DDP until all of these other requirements have
23 been obtained?

24 MR. STOKES: Well, there are some requirements that
25 are probably a little less directly associated with the

1 Interior land. I think that on-site disposal is the core
2 of this plan. It strikes me that it is rather futile to go
3 ahead and approve if it will be impossible to effectuate, you
4 know, the permit or make any use of it. I think in the
5 case, I guess, basically where the entire plan is premised
6 on this other permit on BLM land that this decision should
7 hold off until that legislation is passed, if it ever is. It
8 looks like it's in some doubt right now.

9 MR. RUTLEDGE: You really haven't addressed the
10 question. There are many parallel situations, though, that
11 is the problem we are dealing with. We are considering which
12 one comes first.

13 MR. STOKES: Well, I think this is one of the major
14 permits. Of course, we could get into a Catch 22 situation,
15 I suppose, if every other agency took the same stand and yet
16 I feel this is one of the key permits which the application
17 could not go until this legislation occurred. I guess that's
18 my position that it should just be tabled until Congress acts.

19 MR. RICHARDS: Thank you.

20 Any other questions?

21 (No response.)

22 MR. RICHARDS: Thank you, Mr. Stokes.

23 We will take about a ten-minute break before we re-
24 sume with the next witness.

25 (Short recess.)

1 MR. RICHARDS: On the record.

2 The next witness on the list is Mr. Doug Henderson
3 of the Ricky Mountain Oil and Gas Association.

4 STATEMENT OF DOUGLAS HENDERSON

5 MR. HENDERSON: Thank you.

6 My name is Douglas Henderson. I am the executive
7 assistant for the Rocky Mountain Oil and Gas Association's
8 Committee on oil shale. The committee is composed of 24
9 companies and consultants interested in oil shale development.

10 We have actively participated in many programs and
11 on numerous fronts in Colorado and Utah to assure sound
12 planning for oil shale development. The committee is deeply
13 committed to sound economic, social, environmental and
14 technical planning in order to provide the citizens of Colo-
15 rado and the United States with adequate energy supplies in
16 an orderly, efficient manner. To that end, member companies
17 have already invested more than \$500,000,000 in oil shale.
18 You can be comfortable in knowing the committee's desire to
19 develop oil shale right the first time.

20 The Department of the Interior's Prototype Oil
21 Shale Leasing Program was conceived and pursued in the
22 commendable spirit of moving ahead with oil shale development.
23 This single effort, however positive, is a necessary first
24 step, but we must recognize the program alone won't solve
25 America's energy problems. On the one hand, there are those

1 in government trying to proceed with resource development,
2 but, on the other hand, others in government are doing all
3 they can to harass, stall or stop development with valiant
4 assistance from environmentalists.

5 Never before has industry faced so many hurdles on
6 the road to successfully supplying market demands. Punitive
7 price controls, well-intended but disastrously restrictive
8 environmental regulations, various jurisdictional disputes,
9 and countless delays in court are but a few examples. Private
10 industry is understandably unable to commit huge sums of
11 money in today's confused environment.

12 If the United States and the free world are to
13 maintain a healthy economy in future years, a broader and more
14 deliberate expression of national policies favorable to
15 investment in energy development is necessary. Domestic and
16 non-communist supplies of conventional crude oil are dwindling
17 rapidly. In fact, recent figures show free world consumption
18 has reached 17,000,000,000 barrels a year, while new dis-
19 coveries are being made at the lesser rate of 15,000,000,000
20 barrels per year.

21 Simple arithmetic demonstrates the obvious nature
22 of the energy supply problem and yet our political leaders
23 have chosen to ignore the facts to lull the American public
24 into a false sense of security. Yes, we have adequate energy
25 supplies today, but at tremendous costs in both U.S. dollars

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1 paid overseas and in U.S. dollars lost to the American
2 economy. The sense of urgency has gone, and we have ful-
3 filled the wildest dreams of those who wish to profit from
4 our mistakes.

5 As I mentioned earlier, the Prototype Oil Shale
6 Leasing Program is a positive step toward realizing greater
7 supplies of energy from domestic sources. We are grateful
8 for your recognition of both the energy shortage and the
9 viability of oil shale as a future energy source. Our con-
10 cern is for a renewed and strengthened effort to follow the
11 course of prudent energy development. We must not lose our
12 sense of urgency by joining the uninformed in feeling secured
13 for future generations.

14 The United States has 72.7 per cent of the world's
15 oil shale resources or roughly 1000 billion barrels of re-
16 coverable oil shale according to the 1974 World Energy Con-
17 ference. Of these, 600 billion barrels are in the Green
18 River formation underlying Colorado, Utah and Wyoming. The
19 United States government owns approximately 80 per cent of
20 the formation, or 480 billion barrels of shale oil. The
21 benefactors of private capital and expertise being appropriated
22 for oil shale development must eventually be the American
23 public in the form of adequate energy supplies as well as
24 royalties and bonuses paid to public coffers.

25 In summary, we believe oil shale to be one of the

1 best answers to America's energy problems. Your efforts to
2 develop oil shale, along with those of the operators of the
3 Rio Blanco Oil Shale Project, must not cease. I urge you to
4 renew and strengthen your commitment to oil shale development
5 by treating the Detailed Development Plan in the same spirit
6 in which it was developed and submitted, which is a reasoned,
7 thoughtful approach to oil shale development. So long as you
8 do not become alarmed by those using alarmist tactics,
9 reasonable people can carefully and adequately provide a
10 very positive response to the energy needs of future genera-
11 tions.

12 Thank you.

13 MR. RICHARDS: Thank you, Mr. Henderson.

14 Any questions or comments from the panel?

15 (No response.)

16 MR. RICHARDS: Thank you very much.

17 Mr. James Ross of Colorado Northwestern Community
18 College in Rangely.

19 Mr. Ross, we are appreciative of the use of your
20 facilities when we were recently in Rangely.

21 MR. ROSS: You're welcome.

22 STATEMENT OF JAMES H. ROSS

23 MR. ROSS: I am James Ross, Dean of Students, at
24 Colorado Northwestern Community College and I am here today
25 really filling in for Dr. Bos who was unable to be here due

1 to a recent operation and I am really representing three
2 different interests. The college would be one. I am also
3 a member of the Rangely Planning Commission and also a
4 resident of Rangely.

5 Speaking first for the college, I would like to
6 read the statement that Dr. Bos had prepared.

7 Our Northwestern Community College has been
8 charged by the State Commission on Higher Education to serve
9 the higher educational needs of a five-county area which
10 includes Rio Blanco, Moffat, Routt, Jackson and Grand
11 Counties. We strive to offer quality programs in education
12 and training for all who can profit from instruction and
13 who have the desire to learn.

14 In the event and hope that oil shale development
15 becomes a reality, we feel that Colorado Northwestern
16 Community College has the resources to implement the resulted
17 needed academic and vocational technical programs. If we
18 may be an assistance or serve in a manner to meet the needs
19 of the community or service area, we deem it appropriate to
20 emphasize our support in activities that will further economic,
21 social and cultural development associated with the community
22 and the state of Colorado.

23 He has also instructed me to add any words that I
24 would like to include. I would like to tell the panel that
25 Colorado Northwestern Community College is currently in an

1 expansion program with both programs and building. We have
2 a new program which we are implementing this year in building
3 trades which is really a result of the impact not only on
4 Rangely but of the five-county area and the resultant needs
5 and demands of this community. The building is being con-
6 structed this summer to house that new program. Such a
7 program would be of great assistance in the event of develop-
8 ment of oil shale providing the needed expertise and trained
9 personnel to help in that development.

10 I feel that I speak for the majority of the faculty
11 in saying that we encourage and feel that the development of
12 oil shale will have a positive effect upon the Colorado
13 Northwestern Community College.

14 Speaking as a member of the Rangely Planning
15 Commission, we have held a number of open meetings in the
16 community in past months inviting interested parties to come
17 and give their reaction to the development, to the master
18 plan as it has been developed and, by far, the vast majority
19 of the Rangely residents are very positive and very much in
20 favor of oil shale development. As a matter of fact, I guess
21 I would say that they are impatient for it to begin. And
22 the town of Rangely is planning, as much as possible, a
23 development of the water resources and the sewer, the school
24 system and the recreational programs to anticipate the impact
25 that may be coming to the Rangely area, not only the antici-

1 pation but also the hope that this will develop.

2 And then including as a citizen living in Rangely,
3 I would reaffirm that we feel and I feel that the development
4 of oil shale will have a very positive impact upon Rangely
5 and upon the surrounding area and I would hope that it would
6 proceed with all speed possible to be implemented and in-
7 corporated in a responsible, orderly manner.

8 Thank you.

9 MR. RICHARDS: Thank you, Mr. Ross.

10 Are there any questions or comments from the
11 panel?

12 (No response.)

13 MR. RICHARDS: Thank you very much.

14 Next we have C. W. (Bill) Brennan of the Rio
15 Blanco County, Chairman of the Board of County Commissioners
16 of Rio Blanco County.

17 STATEMENT OF C. W. BRENNAN

18 MR. BRENNAN: Members of the hearing panel, ladies
19 and gentlemen, my name is Bill Brennan. I am chairman of the
20 Board of County Commissioners of Rio Blanco County and for
21 the past 30 years I have operated a ranch on Piceance Creek
22 in Rio Blanco County. I have run cattle and livestock on
23 both the C-a and C-b federal oil shale lease sites. I am
24 here as a representative of the Board of County Commissioners
25 of Rio Blanco County and the people of Rio Blanco County.

1 As I stated in my testimony at the hearing on the
2 C-b oil shale lease site Detail Development Plan, my county's
3 concern for maintaining a good quality of life in our county
4 is well documented. We worked for and supported the desig-
5 nation of the Flat Tops Wilderness Area in the east end of
6 our county. We have appeared many times before various state
7 and federal committees concerning the development of our oil
8 shale and coal resources. Over the years our position has
9 not changed.

10 We believe in the proper use and development of
11 the natural resources in our county. Just as we supported
12 the creation of the Flat Tops Wilderness Area, we also support
13 the development of prototype oil shale lease sites in our
14 county. These lease sites were intended to be experimental.
15 Their purpose was to find out if oil shale could be
16 economically and safely developed to provide the energy needs
17 of our country. We in Rio Blanco County need to know the
18 answers to this question as much as the nation does. If we
19 are to plan for proper growth and development in our county,
20 we must know whether such an industry can exist.

21 While the government's intentions were good at the
22 time the leases were sold, needless red tape and duplication,
23 together with harassment by environmental groups for no other
24 reason than they oppose any development, has led to needless
25 delays and expense. If these policies continue, we will all

1 lose. We need the answers that can only be supplied by the
2 development of these sites. Computer analysis, projections
3 and wild guesses will never replace actual construction and
4 production of oil shale. The only way anyone is really going
5 to know the effects of an oil shale plant is by the con-
6 struction and operation of one.

7 If the companies are willing to gamble their money,
8 that they can economically produce oil shale and meet proper
9 environmental standards, then we feel they should be per-
10 mitted to go ahead and try. The two relatively small projects
11 proposed for the Piceance Creek Basin are not of such a size
12 as to destroy the environment of that area or of Rio Blanco
13 County. We feel that the answers that will be gained from
14 this development are well worth the small risks to be taken.

15 The Detailed Development Plan for federal lease
16 site C-a has been reviewed by our planning staff. We feel
17 that the main concerns of Rio Blanco County are adequately
18 covered by the plan as submitted. Again, as with the C-b
19 developers, we have had good cooperation from the developers
20 of the site throughout their program.

21 Please, let me emphasize that we are not advocating
22 the wide-open, unregulated development of the oil shale re-
23 sources in the Piceance Creek Basin. As residents of the
24 area we feel that we have a more legitimate concern for the
25 environmental damage that could be caused by these sites than

1 some of the special interest groups who routinely appear to
2 oppose any development. As a permittee, I personally feel
3 the environmental impact of the ever increasing wild horse
4 population could be more of a threat than a well managed
5 revegetation plan of C-a. We believe that these lease sites
6 are developed, their impact can be judged with facts rather
7 than speculation. We need these facts and we need the
8 answers.

9 And I might add, it isn't on this statement, but
10 I might add that Rio Blanco County Commissioners are on
11 record supporting the off-site piling of the shale.

12 I thank you.

13 MR. RICHARDS: Thank you, Mr. Brennan.

14 Any questions or comments from the panel?

15 (No response.)

16 MR. RICHARDS: Thank you very much for coming
17 over.

18 Mr. Brad Klafehn.

19 Mr. Klafehn, how close did I come to pronouncing
20 your name right this time?

21 MR. KLAFEHN: You came right the second time.

22 MR. RICHARDS: Good.

23 STATEMENT OF BRAD KLAFEHN

24 MR. KLAFEHN: My name is Brad Klafehn and I am
25 testifying here today as a private citizen. My conclusion

1 regarding this Detailed Development Plan, after having read
2 both it and the OSEAP's comments, is that this Rio Blanco
3 Oil Shale Project DDP is an extremely far-sighted document.
4 In fact, it presents what is probably the most far-sighted
5 mining plan I have ever seen.

6 One way in which this DDP expresses its far-sighted-
7 ness is the time perspective from which it has been written.
8 Mining plans usually cover a period of five, ten, or twenty
9 years. Rio Blanco Oil Shale Project, however, suffers from
10 no such limited viewpoint. This DDP would have us believe
11 that they plan not in terms of decades but in terms of
12 generations and centuries.

13 For example, various maps found in the DDP, as well
14 as the description given of the size of the mine on
15 Page 4-2-8, both indicate that by the end of Phase II operations,
16 that is by the year 2015 or 2025, the open pit will cover
17 approximately 750 acres. This is out of 5,000 acres granted
18 to the lessees. This is about one-sixth of the entire tract.
19 The lessees, though, are not so short-sighted as to plan only
20 that far, some 39 years into the future. Rather, they
21 assure us, in justifying the proposed off-tract location for
22 the processing facilities, that the entire tract will even-
23 tually be mined, Page 6-2-1. And we are told elsewhere in
24 the DDP that this process will take "several decades or a
25 few hundred years", Page 2-2-9. This, I think all of us

1 would have to admit, is indeed long-range planning. But
2 though it does go beyond the proper scope of this DDP and
3 the Prototype Leasing Program by perhaps several hundred
4 years, this long-range planning is not without its effect on
5 the short-term plans presented here.

6 For example, this far-sighted planning for the
7 future is the justification, one might add, the only justifi-
8 cation found in the DDP, for placing both processing
9 facilities and the spent shale itself off the C-a tract.
10 We are told that locating them on the currently leased land
11 would interfere with the eventual total mining of the leased
12 area, even though Rio Blanco acknowledges that this complete
13 mining, dependent on a dramatic mark-up in scale from Phase
14 II operations, is problematic at best and might never occur,
15 and that even if it did occur, the mining of the entire tract
16 would, in all likelihood, take several generations to reach
17 completion.

18 Thus, all of the speculative talk in the DDP of
19 eventualities beyond the Phase II limit, such as the need for
20 the huge Yellow Creek Reservoir, and the supposed beneficiality
21 of leaving open cuts on the south and east sides of the open
22 pit, as well as all the planning details for the first two
23 phases which are predicated on post-Phase II occurrences,
24 such as justifying the need for off-tract lands on the even-
25 tual mining of the whole tract centuries in the future, should

1 be seen for what they truly are, totally unsupportable
2 propositions designed to confuse one's realistic considera-
3 tion of near-term circumstances and alternatives by exposing
4 one to the demands of a future time which is so far off as
5 to be unpredictable.

6 This is what has happened with this DDP, a document
7 which also exemplifies perfectly a second meaning of the
8 word "far-sighted", namely a condition of the eye in which
9 vision for distant objects is better than for near objects.
10 This DDP is, as I have said, extremely far-sighted, for how
11 else could one describe an operation which bases its plan
12 for the immediate future on circumstances obtaining 40 years
13 down the road, circumstances which even the developers
14 recognize to be extremely conjectural? Rio Blanco Oil Shale
15 Project purports to be able to see things that far distant,
16 yet its plan seems not to recognize the immediate facts, the
17 near objects, of its situation.

18 One of these near facts, the magnitude of which it
19 is easy to overlook when reading this DDP because of the ex-
20 tremely long perspective in which it is placed, is the pro-
21 jected size of the spent shale pile on 84 Mesa and the length
22 of time it will take to complete it. The DDP states that
23 backfilling of the open pit will not begin until 30 years of
24 Phase II operations have elapsed. This seems reasonable enough
25 when read in a document such as this one. The jargon pro-

1 tects one from understanding what it really says. But were
2 we to stop and think about it and if we're to have life ex-
3 pectancy actuarial tables before us at this hearing, we could
4 very easily predict that precious few of us now in this
5 room will still be alive when Rio Blanco Oil Shale Project
6 begins to backfill the pit. This means that, were operations
7 on the tract to proceed according to the schedule set forth
8 in this DDP, for the rest of our natural lives all of us would
9 be able to see "from virtually every direction", Page 7-2-7,
10 the pile of spent shale on 84 Mesa continually growing in
11 size. Those of us who are now 30 years old would be 70 before
12 we could see the completed pile standing in majesty, rising
13 1,000 feet above the surrounding landscape and extending for
14 three miles.

15 This is one of the near objects which this plan
16 never manages to bring into sharp focus. There are many other
17 examples of this which could be brought out here, but I will
18 settle for emphasizing the most pertinent of them all, the
19 law of the land. It hardly matters how accurate one's
20 planning is for the long-term future if one cannot meet the
21 laws which are in existence at this moment. Rio Blanco has
22 focused so poorly on this vital subject that it is asking the
23 Department of Interior to approve a mining plan which is pat-
24 ently illegal. The DDP freely admits that it cannot proceed
25 with its plans until certain state and federal actions occur.

1 What it does not state is that the Department cannot approve
2 the DDP in its present form until these actions have been
3 taken and for the lessees or the Department to assume that
4 this will happen within the six-month time period in which
5 Interior has promised a decision on this DDP is nothing more
6 than a totally unrealistic leap of faith.

7 Very briefly, there is no statutory authority, as
8 both the lessees and the Department are aware, for the
9 leaseholders to be granted additional lands off the currently
10 leased tract for processing activities or spent shale dis-
11 posal. Yet use of these lands is what the entire DDP is based
12 on. The Department of Interior is thus placed in the posi-
13 tion of having to either reject this DDP or be a party to the
14 violation of the Mineral Leasing Act of 1920.

15 The other pressing legal difficulty which confronts
16 Rio Blanco Oil Shale Project is that modeling of projected
17 emissions shows that the proposed operations would violate
18 state air quality regulations. Rather than changing its
19 design plans, however, Rio Blanco has opted to depend on the
20 state to reclassify the Piceance Basin air quality designa-
21 tion. This is a piece of optimism which may be hard to sub-
22 stantiate in the real world, especially in the time frame in
23 which Interior must make its judgment of the DDP.

24 Substantive comments have been received by the
25 Area Oil Shale Supervisor from OSEAP members on the adequacy

1 of environmental descriptions found in the DDP. While this
2 is an important area of concern, the first priority of the
3 Department must be to judge the legality of the proposed
4 development plan. For one I certainly hope that the Depart-
5 ment does not prove itself to be as far-sighted and as unob-
6 servant of the realities of the current situation as is the
7 Rio Blanco Oil Shale Project. Trying to stick one's head in
8 the sand will not make these legal difficulties go away,
9 rather it will only expose the other end to attack.

10 This DDP is an extreme example of a mining plan which
11 must be rejected. The Department of Interior must do so and
12 must send the companies back to the drawing board to come
13 up with a project plan which conforms to the law.

14 Thank you.

15 MR. RICHARDS: Thank you.

16 Any questions?

17 Mr. Rutledge.

18 MR. RUTLEDGE: Yes, Brad, you brought up that, I
19 believe you said, that approval of this particular develop-
20 ment plan would be in violation of the Mineral Leasing Act
21 of 1920. But you didn't elaborate as to why. I wonder if
22 you would give us some specifics on that.

23 MR. KLAFEHN: Well, of course, I'm not a lawyer,
24 but since the DDP itself is predicated, the entire plan is
25 based on having the use of the off-site lands for building

1 processing facilities and spent shale disposal, it seems to,
2 you know, the ruling of the current DDP, the Department would
3 be saying to the lease holders that in their judgment it is
4 fine and proper to go ahead with that, the use of that off-
5 tract lands. Now, as I say, it occurs to me that possibly,
6 you know, that lessees would be liable, too, but certainly
7 the Department of the Interior is very much aware of the
8 opinion of its own solicitors office as stated and the DDP
9 even quotes it back on Page 2-1-14 that there is currently
10 no statutory authority for the use of off-tract lands.

11 Does that answer your question?

12 MR. RUTLEDGE: Not really, Brad.

13 MR. KLAFEHN: Well, I wish I could be more helpful.

14 MR. RUTLEDGE: Yes, I was looking for something
15 specific in the Mineral Leasing Act. We discussed a little
16 bit about that before this question, the problem of that.
17 But thank you for your help.

18 MR. KLAFEHN: Well, as I understand it, I'm not
19 sure if it's the lease or if it's the final impact statement
20 and plus all of the case laws certainly would restrict the
21 lessees to the land they've leased. Certainly it was the in-
22 tent of Congress in passing the Mineral Leasing Act that all
23 the operations going on with leases granted under it would be
24 conducted on the leased area itself. And that, of course, is
25 the rationale for having the bill on the Senate now to approve

1 the off-tract land use.

2 MR. RUTLEDGE: Thank you.

3 MR. RICHARDS: I note that like me you wear glasses.
4 Are you far-sighted or near-sighted?

5 MR. KLAFEHN: Sir, I am near-sighted.

6 MR. RICHARDS: How fortunate for you.

7 MR. KLAFEHN: Yes.

8 MR. RICHARDS: Carolyn Johnson with the Colorado
9 Open Space Council.

10 STATEMENT OF CAROLYN JOHNSON

11 MS. JOHNSON: Members of the hearing panel, ladies
12 and gentlemen, I am here today presenting the views of the
13 Colorado Open Space Council, a statewide coordinating council
14 of environmental and public interest organizations, on the
15 Detailed Development Plan for oil shale tract C-a, submitted
16 to the Department of Interior by Gulf and Standard of Indiana
17 Oil Companies. My name is Carolyn Ruth Johnson and I am
18 chairperson of the Colorado Open Space Council Mining Workshop.

19 When the oil shale prototype leasing program was
20 approved, the Department placed a major emphasis on the DDP
21 preparation and approval as a stage that was crucial to the
22 Department's administration of the program, to the lessees'
23 compliance with the lease terms and stipulations and local,
24 state and federal laws, and to the Department's duty to inform
25 the public and respond to its concerns.

1 However, this DDP is patently illegal and should
2 be disapproved immediately. In view of the overwhelming
3 illegality of this plan, it is the only issue which should
4 be addressed at these hearings. Should the lessees at a
5 later time submit to the Department a legal plan, we would
6 urge, and indeed expect, the Department to have hearings on
7 the substance of that plan. At that time we would also expect
8 the Department to comply with the National Environmental
9 Policy Act which requires that an Environmental Impact State-
10 ment be written on major actions of the federal government
11 that would significantly affect the environment. A decision
12 on whether to approve such a legal DDP would be a major
13 action.

14 Now, turning to the DDP's illegalities, central to
15 the DDP submitted by the lessees is the use of additional
16 federal lands off the lease tract, 640 acres for processing
17 facilities and 3,650 acres for dumping the shale tailings.
18 No detailed plans for locating these key components on the
19 lease tract are presented as any intentions of the lessees.
20 Yet, the DDP admits that the lessees are fully aware that
21 the Solicitor of the Department of Interior has determined
22 that the Mineral Leasing Act does not give the Department
23 the authority to permit use of these additional federal lands
24 for these activities, Page 2-1-14. According to the Mineral
25 Leasing Act of 1920, the lands within an oil shale lease in-

1 clude such lands that might be used for extraction and re-
2 duction of the leased minerals. Thus, the central thesis of
3 the four volume DDP is a blatant violation of the Mineral
4 Leasing Act, the entire plan rests on that assumption
5 and no development plan can be written without focusing on the
6 two key components, processing and disposal of tailings.

7 We are extremely concerned about this thesis of
8 the DDP for two reasons. First, it violates the Mineral
9 Leasing Act, and the DDP itself, because it is based on such
10 a violation, violates the oil shale lease, which was issued
11 under the authority of the Mineral Leasing Act.

12 Second, use of these additional lands would almost
13 double the amount of land that would be severely impacted by
14 the mining, processing and waste disposal. We think it is
15 critically important to achieve one of the goals of the pro
16 gram, "to ensure the environmental integrity of the affected
17 areas...", Page III, Volume 1, Final Environmental Statement,
18 that the disturbed land in the area be kept to an absolute
19 minimum. We think that it is critically important that the
20 disturbed land in the area be kept to an absolute minimum,
21 that is the tract itself. According to material prepared by
22 the lessees, tract C-a is sufficiently large to accommodate
23 the operation of an open pit mine yielding 50,000 barrels per
24 day of shale oil for 30 years, which would be an adequate
25 test of the commercial viability of a potential oil shale

1 industry, as the prototype programs were designed to achieve.

2 On the environmental regulations, Sections 10 and
3 11 of the oil shale lease are explicit in their requirements
4 of the lessees in regard to environmental regulations: "The
5 Detailed Development Plan shall include (2) a detailed de-
6 scription pursuant to 30 CFR Part 231 and 43 CFR Part 23 of
7 procedures to be followed to assure that the development
8 plan, and lease operations thereunder, will meet and conform
9 to the environmental criteria and controls incorporated in
10 the lease (10).

11 And Section 11 spells out, "The lessee shall con-
12 duct all operations under this lease in compliance with all
13 applicable federal, state and local water pollution control,
14 water quality, air pollution control, air quality, noise
15 control, and land reclamation statutes, regulations, and
16 standards." (11)(a).

17 However, the development planned by the lessees
18 will apparently not satisfy these basic lease requirements.
19 For example, the DDP is frank and succinct about the inability
20 of the lessees to comply with air pollution laws and standards
21 of both the federal government and the state of Colorado.
22 It states, Page 2-1-16, 17, "It will thus be impossible to
23 develop Tract C-a in accordance with the Federal Clean Air
24 Act as now written. ... modeling indicates that Phase II
25 Rio Blanco Oil Shale Project operations will not meet Colorado's

1 current short-term ambient SO₂ standards."

2 In conclusion, clearly the C-a lessees have sub-
3 mitted a DDP that does not comply with the lease require-
4 ments of a DDP, nor does it comply with the Mineral Leasing
5 Act, under which the leasing program was authorized. The
6 only alternative which the lessees present is, incredible
7 in its presumptuousness, that the laws must be changed to
8 accommodate their plans, their plans do not accommodate the
9 law. (See, for example, 2-1-14, 2-1-17.) Therefore, the
10 only valid and responsible course for the Department of
11 Interior is to disapprove the DDP and require that a new one
12 be written. If the Department were to approve this DDP, it
13 will have done so in defiance of its own rules and regula-
14 tions and in full knowledge that the Department's action openly
15 invites legal attack.

16 Then I would like to append to my statement and
17 personally hand to Mr. Rutledge a letter which I will now
18 read.

19 Dear Mr. Rutledge: In the testimony I presented
20 for the Colorado Open Space Council at the Denver public hear-
21 ings on the C-b oil shale Detailed Development Plan held
22 April 22 of this year, I formally requested a copy of the
23 specific criteria on which the AOSS would base his decision
24 to approve or reject Oil Shale Development Plans. To date I
25 have received no response from your office in regard to this

1 request.

2 We would expect that you have formulated such
3 criteria, guidelines and checklists in accordance with one
4 of the four objectives of the prototype leasing program. I
5 quote, "Develop management expertise in the leasing and
6 supervision of oil shale development in order to provide the
7 basis for future administrative procedures", FES, Volume 1,
8 Page iii.

9 Your review of the C-b and C-a Detailed Development
10 Plans is certainly the logical point at which to develop
11 this management expertise.

12 Knowing your commitment to the objectives of the
13 prototype leasing program, I would again like to request that
14 a copy of the criteria, guidelines and checklists which you
15 will use in reaching your decision on the DDP's be promptly
16 sent to me."

17 MR. RICHARDS: Thank you.

18 Any questions?

19 MR. RUTLEDGE: I will personally deliver that to
20 you and in much detail.

21 MS. JOHNSON: If the Department cannot deliver it
22 in any other way, we would expect it to be the real ticket,
23 plus the motel ticket.

24 MR. RUTLEDGE: No, we would be glad to see you over
25 there.

1 MR. RICHARDS: Let's take about another five-minute
2 break.and then we will finish up, I think.

3 (Short recess.)

4 MR. RICHARDS: On the record.

5 Seated at the witness table is Ms. Katherine
6 Fletcher and she is accompanied by Mr. David Mastbaum. They
7 are both from the Environmental Defense Fund.

8 STATEMENT OF KATHERINE FLETCHER and DAVID MASTBAUM

9 MR. RICHARDS: Ms. Fletcher.

10 MS. FLETCHER: Thank you. We appreciate very
11 much the opportunity to present the views of the Environmental
12 Defense Fund on the Detailed Development Plan presented to
13 the Department of the Interior by Standard of Indiana and
14 Gulf Oil Companies, the holders of federal oil shale lease
15 C-a. I am Katherine Fletcher, staff scientist for Environ-
16 mental Defense Fund's regional office here in Denver and
17 with me today is David Mastbaum, Environmental Defense Fund
18 staff attorney assigned to oil shale.

19 As the Department and the lessees are well aware,
20 the proposed oil shale development plan, if implemented, would
21 violate existing mining and environmental laws. In particu-
22 lar, the lessees do not have, nor can the Department of
23 Interior give them, the right to utilize land in excess of
24 the lease tract for the processing and disposal phases of the
25 oil shale operation. This fact has repeatedly been brought

1 to the attention of the lessees and the Department since the
2 inception of the leasing program. And the Solicitor of the
3 Department in early 1975, well before the preparation of this
4 Detailed Development Plan, confirmed that additional legis-
5 lation would be required if any of the oil shale lease
6 operations were eventually to include off-tract lands.

7 Given this early definitive notification, as well
8 as the fact that the lessees never had any formal commitment
9 of additional lands from the Department, we are amazed that
10 the lessees have proceeded to prepare a plan completely de-
11 pendent on off-site waste shale disposal and even an off-site
12 processing plant. Indeed, the additional lands assumed in
13 the DDP cover almost as much surface area as the C-a lease
14 itself. We are struck by this demonstration of intransigence
15 and inflexibility on the part of the lessees in the face of
16 clear legal restraints.

17 In our view, it would have been more constructive
18 for the lessees to formulate a development plan which could
19 be carried out within the scope of existing legal require-
20 ments. We are certain that they could have, especially on
21 Tract C-a, which contains the richest and largest shale re-
22 serve of any of the federal tracts, apparently over 5,000,000,000
23 barrels of recoverable shale oil. Surely for the purposes of
24 the prototype program a development plan in conformity with
25 existing legal mandates could have been formulated.

1 We were never under the impression that the proto-
2 type leasing program was designed to provide the lessees a
3 guarantee of a multi-hundred thousand barrel per day operation
4 for virtually an indefinite period of time. Naively, perhaps,
5 we thought that ~~the~~ prototype leasing program was intended to
6 provide a full-scale test of oil shale development, with an
7 eye toward determining whether the establishment of a full-
8 scale industry was advisable. Yet C-a's justification for
9 wishing immediately to burst out from the boundaries of the
10 lease they bought and signed appears to be their plans for an
11 oil shale operation large enough to give anyone pause.

12 In many respects, this DDP is a lobbying document
13 directed at pending federal legislation which would allow the
14 granting of up to 6,400 additional acres to federal oil shale
15 lessees. Unfortunately for Gulf and Standard, however, that
16 legislation is at the present time virtually dead. Their
17 motivation for proposing the DDP to the Department in its
18 present form can only be that if the Department approves the
19 plan, the lobbying position of the lessees will be enhanced
20 when they go back to Washington next session and again try to
21 persuade Congress to pass their bill. The Oil Shale Environ-
22 mental Advisory Panel is also in an awkward position, being
23 pushed to approve this illegal plan, knowing that this might
24 help the Gulf and Standard lobbying efforts. We do not feel
25 that the DDP is an appropriate vehicle for pushing legislation.

1 The DDP contains numerous arguments by the lessees
2 that the proposed shale dump area, 84 Mesa, and plantsite,
3 immediately north of Tract C-a, are the best locations for
4 these facilities. Although we find these arguments far from
5 compelling, if true, they simply suggest that the original
6 delineation of the tract boundaries, based on industry
7 nominations, was poorly done. Apparently Gulf and Standard
8 feel that an optimum prototype tract would have included as
9 much of 84 Mesa, the proposed plant site, and the northwest
10 corner of C-a as could be accommodated in the 5,120 acres
11 allowable under the Mineral Leasing Act. The lessees in
12 January of 1974 willingly and eagerly accepted the current
13 boundaries when they bid \$210,000,000 for the lease. It
14 might therefore be more appropriate for them to ask the De-
15 partment to redraw the tract consistent with current informa-
16 tion on the supposedly more environmentally sound operational
17 layout. Obviously, a very large prototype operation could be
18 developed on such a redrawn tract.

19 The DDP is based on yet other assumed changes in
20 existing laws. Of particular concern to us is the lessees'
21 desire to weaken air quality standards and classifications.
22 The DDP admits that the proposed development, even the initial
23 modular stages, cannot comply with Colorado's SO₂ standard
24 for that area. Particulates are also predicted to be a
25 severe problem. In addition, EPA has stated (Comments May 14,

1 1976) that their calculations, at variance with the figures
2 in the DDP, show violations even of EPA's Class II SO₂
3 standards, which are far weaker than the Colorado Class I
4 standards in effect in that area at the present time.

5 The lessees freely admit that their plan cannot
6 meet current or even proposed air quality laws. Quoting
7 from the Detailed Development Plan, "It will thus be
8 impossible to develop Tract C-a in accordance with the
9 Federal Clean Air Act as now written. Amendments currently
10 being considered by Congress will not solve the problem."
11 DDP, Volume I, Pages 2-1-16, 17.

12 As is clearly and repeatedly stated in the Environ-
13 mental Impact Statement on the Prototype Leasing Program in
14 the oil shale lease and in the DDP, the oil shale leasing
15 program is based on a requirement that existing state and
16 federal laws protecting environmental quality will be met.
17 This commitment on the part of the Department and the lessees
18 has been the cornerstone of assurances that the anticipated
19 environmental impacts of oil shale development will not be
20 unacceptable.

21 Yet now we see the lessees insisting that laws be
22 changed in order that this commitment can be met. We hope
23 the Department does not share this cynical view of the
24 assurances which have been made so frequently. In our view,
25 to carry out a responsible oil shale program, it is the de-

1 velopment plans which should come into conformance with the
2 law, rather than the laws being weakened to accommodate the
3 plans.

4 We again remind the Department of a statement in
5 the final Environmental Impact Statement on the leasing pro-
6 gram which it issued. "No operations will begin on any
7 tract until a development program that fully meets all en-
8 vironmental criteria, controls and constraints has been
9 finally approved by the mining supervisor, acting for the
10 Secretary." We would just stress that the development pro-
11 gram referred to in this statement is apparently the Detailed
12 Development Plan under consideration today.

13 Lastly, we think it is highly questionable whether
14 the Department can legally approve a DDP which if implemented
15 would violate existing laws. As you know, not only was the
16 DDP submitted early, allowing ample time for revision, but
17 also the lease contains a procedure for rejection of inade-
18 quate DDP's, Section 10(a). In fact, the lessee is given
19 three chances to formulate a DDP which meets the requirements
20 of the lease.

21 Even more so than in the case of the C-b DDP, which
22 also projected air quality violations, we think that the
23 C-a plan, based on multiple inconsistencies with current
24 laws, is of necessity a candidate for rejection under Section
25 10(a) of the lease. To act responsibly, and to avoid poten-

1 tial litigation, the Department has no choice but to disapprove
2 this Detailed Development Plan.

3 I might also add that the Environmental Defense
4 Fund, as stated many times in the past, also agrees with
5 other organizations' testimony today, that Environmental
6 Impact Statement would, of course, be required for the site
7 of the specific Detailed Development Plans.

8 Now, Mr. Mastbaum has a few comments to make on the
9 questions raised by Mr. Rutledge earlier concerning the
10 Mineral Leasing Act and the violations of this DDP.

11 MR. MASTBAUM: Mr. Rutledge raised a question con-
12 cerning what section of the Mineral Leasing Act would be
13 violated by approving off-site disposal as set forth in the
14 DDP. I would like to refer him to the September 12, 1975,
15 letter by Assistant Secretary Horton on the transmittal
16 letter accompanying as 2-4-13, third, or fourth paragraph,
17 excuse me, states that, "The Department presently has no
18 statutory authority to grant to oil shale lessees additional
19 lands outside of the leased area for disposal sites."
20 Assistant Secretary Horton's statement was apparently based
21 on Section 21 of the Mineral Leasing Act of 1920. The
22 prototype program was conceived and designed in the context
23 of existing law which limits the acreage control by any one
24 lessee to any 5,120 acres and I will now cite specifically 21,
25 "No lease hereunder shall exceed 5,120 acres of land and not

1 more than one lease shall be granted under this section to
2 any one person, association or corporation. According to a
3 law of the lands, such lands lease includes those that might
4 be used for extraction of leased minerals."

5 MR. RICHARDS: Thank you.

6 Any questions or comments from the panel?

7 (No response.)

8 MR. RICHARDS: Thank you very much.

9 MS. FLETCHER: Thank you.

10 MR. MASTBAUM: Thank you.

11 MR. RICHARDS: We have next on the list V. Crane
12 Wright.

13 Ms. Wright, it's nice to have you. I wasn't sure
14 in what capacity you are appearing today so I left that off.

15 MS. WRIGHT: Thank you.

16 STATEMENT OF V. CRANE WRIGHT.

17 MS. WRIGHT: Ladies and gentlemen, Hearing
18 Officers, my name is V. Crane Wright. I have been affiliated
19 and have served as officer of several environmental organiza-
20 tions. Among them, Denver Audubon Society and the Colorado
21 Open Space Council. Presently I serve on the board of the
22 National Audubon Society and on the board of the trustees of
23 the Institute of Psychology. I also serve as a member of
24 the Department of the Interior's Oil Shale Environmental
25 Advisory Panel. More specifically to these hearings, I am one

1 of the five OSEAP members assigned to the C-a subcommittee
2 of this panel. I would like to speak today about that
3 capacity.

4 Now, as a brief background, OSEAP has six environ-
5 mental work groups. We also have three subcommittees which
6 oversee the three leased tracts. These subcommittees and
7 work groups operate as a body at meetings called by the
8 chairman of the particular group. And, in the spirit of the
9 panel as set down by the panel chairman, Mr. William Rogers,
10 Assistant to the Secretary of the Interior, any panel member
11 may join the deliberations of the sub groups. An under-
12 standing of our working procedures is important to my main
13 point of discussion.

14 Committee reports, being the product of many
15 people, tend to be viewed with more weight than person remarks.
16 Therefore, I was concerned when Mr. Robert Bolmer, Bureau of
17 Mines and the chairman of the C-a subcommittee, submitted a
18 review memo of the federal-lease Tract C-a to Mr. Rogers
19 dated May 19, 1976. It purports to be from the C-a Detailed
20 Development Plan Review Committee.

21 I would like to open with some generalities on the
22 memo, which I submit for the record. One, the C-a subcommittee
23 has never held a meeting. Two, none of the subcommittee
24 members submitted written comments to the chairman on the
25 DDP. Three, none of the subcommittee members saw or had

1 access to the memo, in draft or final form, for comment or
2 revision before it went to Mr. Rogers. Four, the memo went
3 out the day after our last panel meeting on May 18th and there
4 was no possibility of review of the material presented at
5 that meeting. Yet, Mr. Bolmer asserts that he speaks for the
6 C-a committee. Even if his views were more compatible to
7 mine, I would have to challenge such a unilateral action.

8 As to specifics, contrary to the objectives of the
9 oil shale leasing program as stated by President Nixon who
10 said, "provided that environmental questions can be satis-
11 factorily resolved", and the Department of Interior's, "To
12 assure the environmental integrity of the affected area..." ,
13 the memo says of this DDP that it "...probably represents the
14 most reasonable compromise between economic resource re-
15 covery and unavoidable environmental affects." The lease,
16 I might add, says nothing about brownie points for trying or
17 failing.

18 The memo goes into sub-headings starting with
19 Mining and opens with, "The committee agrees with the lessee
20 that open-pit mining is the only way to develop the tract."
21 The committee did not agree to anything but the panel may
22 have defaulted a choice since we were not given any other al-
23 ternative to consider. I would hardly call that agreement.

24 Waste disposal. Contrary to the conclusion in this
25 memo that the requested waste disposal area, 84 Mesa, cannot

1 be surface mined, I submit internal USGS communications, which
2 question this assumption and address the potential resource
3 loss if 84-Mesa is used as a dumping site. The memo goes
4 on to say that, "84-Mesa has been judged more environmentally
5 acceptable" but fails to say that this judgment was rendered
6 by an internal C-a analysis not by the OSEAP. As every
7 panel member well knows, we have been singularly unsuccessful
8 and frustrated in our efforts to get the lessees to submit
9 any alternatives to the 84-Mesa dumping plans.

10 The next three headings I would generally agree
11 with but this does not negate the fact that the conclusions
12 were not arrived at by committee action.

13 Comments by others. Contrary to the memo's
14 assertion, additional comments were not reviewed by the
15 committee. Also contrary to the memo, some of the concerns
16 raised by the work group members were substantive and
17 serious. I will submit some comments which need concerned
18 attention and request that the full text be part of the
19 record.

20 Taking the lead as a committee member whose one-
21 fifth committee due was not even acknowledged, I would like
22 to repeat my statement during panel discussion. It is very
23 short. "This plan, were it not for the constraints that ex-
24 ist and that the C-a lessees describe so clearly, could con-
25 ceivably be a working plan. However, because of the con-

1 straints, both legal and set by regulation, this DDP does not
2 meet the criteria of the Prototype Program."

3 The various work groups also submitted statements.
4 Rehabilitation. "...objectives should be expanded to include...
5 'the effects of supplemental irrigation'", also "...fencing
6 is necessary for successful reestablishment..."

7 Wildlife work group. "Before the OSEAP takes any
8 action on this issue, the wildlife subcommittee recommends
9 that the legislative process be allowed to complete its
10 course and secondly we recommend that if Congressional action
11 on this legislation, Mesa 84 withdrawal, allows use of off-
12 site lands, a totally independent analysis of alternative
13 sites be undertaken." "...long term commercial development
14 of the shale resource deserves detailed analysis by
15 the OSEAP and the legal and policy staffs of the Department of
16 the Interior." The same sub group concludes with, "Until
17 these issues are resolved, we recommend that no final OSEAP
18 advice be transmitted to the Area Oil Shale Supervisor."

19 Air quality. "...it must be recognized that the
20 plan for development as described in the DDP is not legal
21 under the present lease conditions."

22 Archeology. "Included should be an assessment on
23 impacts on archeological, paleontological and cultural as-
24 pects."

25 Socioeconomic. "Considerable further overall de-

1 velopment of the statement is required if it is to be of real
2 use in mitigating socio-economic impact from the C-a project.

3 USGS representative, Harold Malde, comments with
4 what appears to me great seriousness on geochemistry, seismicity,
5 flora and ecology, soils and overburden, resource recovery,
6 water resources and options for disposal of processed shale.

7 We also have the Colorado Division of Wildlife's
8 concern about the occurrence of the Greater Sandhill Cranes,
9 classified as endangered in our state on 84 Mesa last
10 spring and the appearance of a federal endangered Whooping
11 Crane in that vicinity this spring.

12 And these are termed not serious concerns? And
13 not wrothy of consideration? And do not affect the
14 acceptability of the plan?

15 At a previous meeting, I had expressed my concern
16 that we were being put in a position of recommending an
17 action that is not legal and that we, the panel, were being
18 used as a lobbying tool by the C-a lessees, that the only
19 course I saw was for the suspension of all plans on the project
20 until Gulf's and Standard's proposed legislation has either
21 passed or failed. On this point, serious consideration must
22 be given to the testimony of Senator Floyd Haskell regarding
23 Senate Bill 2413, the 84 Mesa legislation. He says, "It is
24 my position that Senate Bill 2413 should not become law."
25 Especially must we need the Senator when we find that the

1 C-a DDP is predicated on the assumption that Senate Bill
2 2413 will become law.

3 In closing, I would challenge Mr. Bolmer to
4 support his memo and his conclusion that, "All such features
5 are considered technically acceptable and should result in
6 the timely commercial development of the tract with the
7 least possible environmental effect", as having been
8 arrived at through C-a committee action. Failing that, I
9 would expect the memo to be recalled or "personal opinion"
10 put where committee is now featured. Perhaps this will be
11 done at our first committee meeting.

12 Thank you.

13 MR. RICHARDS: Thank you, Ms. Wright.

14 Any comments or questions?

15 (No response.)

16 MR. RICHARDS: Thank you very much.

17 That concludes the list of scheduled witnesses.

18 Are there any other people in the audience who wish to give
19 a statement or to give evidence?

20 All right, I see one back here, this gentleman.

21 STATEMENT OF ROBERT M. WEAVER

22 MR. WEAVER: My name is Robert Weaver. I represent
23 the Colorado Council of Trout Unlimited.

24 Trout Unlimited is primarily concerned with the
25 water supply and water distribution aspects of the Rio Blanco

1 Oil Shale Project. We are strongly opposed to oil shale
2 related water development projects like the Yellow Jacket
3 Project, which has been proposed for the upper regions of the
4 White River and which the Rio Blanco Oil Shale Project has
5 shown interest in.

6 Projects like Yellow Jacket would severely damage
7 wuality watersheds, fisheries and wildlife habitat.

8 The Detailed Development Plan outlines the water
9 supply and distribution plans of the Rio Blanco Oil Shale
10 Project. First, the DDP states that the maximum estimated
11 water demand under Phase II would be 10,000 acre feet per
12 year. Then, under supply it is stated that mine dewatering
13 is expected to yield between eleven to fourteen thousand
14 acre feet per year, more than is required to fulfill the
15 Phase II anticipated needs. The DDP also rather hypotheti-
16 cally states that if expansion beyond the Phase II production
17 level of 55,800 barrels per day of shale oil were to take
18 place, the additional water demand would be approximately
19 10,000 acre feet per year per 50,000 barrels per day. The
20 DDP states the example that 60,000 acre feet of water per year
21 would be required for a 300,000 barrel per day production.

22 Then the DDP goes on to describe an aggressive water
23 right acquisition program which has been conducted by the
24 Rio Blanco Oil Shale Project to secure water for the hypo-
25 thetical expansion beyond the 55,800 barrel per day production.

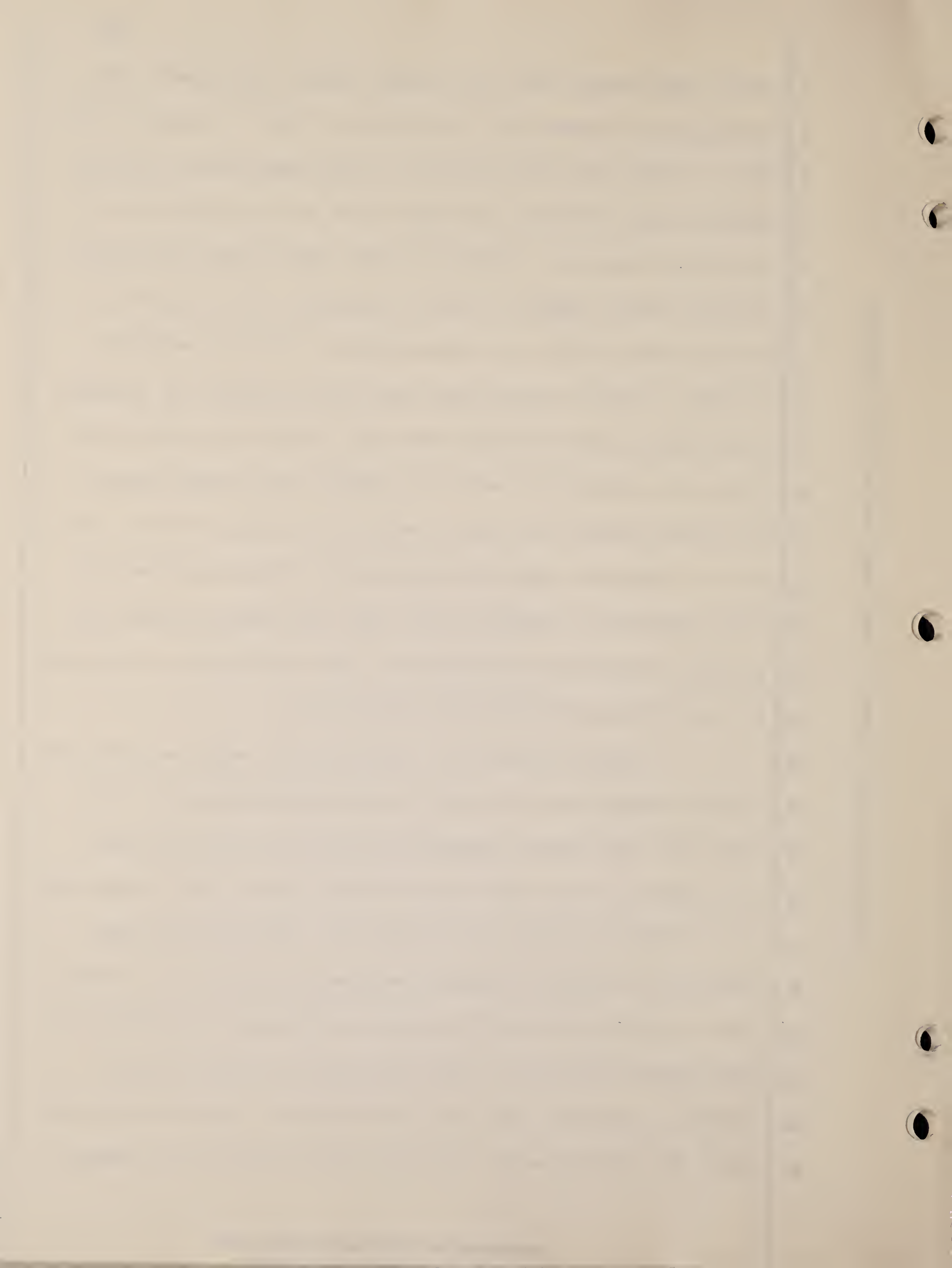
1 These water acquisitions include: 1) Applications claiming
2 96 wells for 1.5 cubic feet per second each. 2) Application
3 for a 428,000 acre foot storage decree and reservoir right-
4 of-way for Yellow Creek reservoir. 3) Acquisition of a 300
5 cubic feet per second conditional decree from the White River.
6 4) Acquisition of an option agreement with the Rocky Mountain
7 Power Company to obtain a minimum of 45,000 annual acre feet
8 per year of water through a change in the points of division
9 for the Rocky Mountain Power Company water rights and I have
10 listed in my testimony the details of those changes of points
11 of division which were not included in the DDP.

12 I think that in light of the above-listed water
13 acquisitions, it is interesting to note that in addition the
14 Rio Blanco Oil Shale Project has also expressed a strong
15 interest in receiving 70,000 acre feet of water from the
16 Yellow Jacket Project which is proposed by the Bureau of
17 Reclamation. However, no mention of this interest in and
18 support for the Yellow Jacket Project was made in the DDP.
19 The Rio Blanco Oil Shale Project water acquisitions clearly
20 go far beyond the anticipated needs for the prototype de-
21 velopment.

22 It seems quite inappropriate that such an
23 aggressive water right acquisition program should be under-
24 taken for hypothetical expansion of the prototype develop-
25 ment when the following factors are considered: First, a

1 major requirement that must be met before development can
2 take place is commercial feasibility. This is stated in the
3 DDP. At this time the project is not commercially feasible
4 without major federal subsidies which have so far been re-
5 jected by Congress. Second, the DDP shows plans for major
6 off-site water supply and waste disposal, including the
7 84-Mesa area which, as acknowledged in the DDP, would be
8 illegal. Third, the service area for the Bureau of Reclama-
9 tion Yellow Jacket Project does not include oil shale least
10 Tract C-a and thus it would be illegal for the Rio Blanco
11 Oil Shale Project to receive water from Yellow Jacket. Four,
12 even if Congress approved legislation authorizing the off-
13 site facilities included in the DDP, the project could not
14 proceed without an environmental impact statement as required
15 by the National Environmental Policy Act.

16 The Rio Blanco Oil Shale Project water acquisition
17 further emphasizes the need for coordinated planning, not
18 only with the federal government but also with the state
19 government as the state has protested some of the claims that
20 the Rio Blanco Project has filed for. Also we know that
21 there are at least 28 water development projects for energy
22 under consideration by the federal government in addition to
23 many private projects. The end result is that a larger
24 number of entities like the Rio Blanco Oil Shale Project are
25 vying for limited water resources with little or no compre-



1 hensive planning or regard for the comprehensive end results
2 in terms of environmental, social and economic effects.

3 To conclude, we believe that the Detailed Develop-
4 ment Plan should not be approved without full compliance with
5 state and federal laws. We also recommend that it be re-
6 quired that the DDP precisely define water requirements and
7 water sources rather than hypothetical needs and sources.

8 Thank you.

9 MR. RICHARDS: Thank you, Mr. Weaver.

10 Any questions or comments?

11 (No response.)

12 MR. RICHARDS: Thank you very much.

13 Are there any others who are not scheduled who
14 wish to testify?

15 Yes, sir.

16 STATEMENT OF BLAINE MILLER

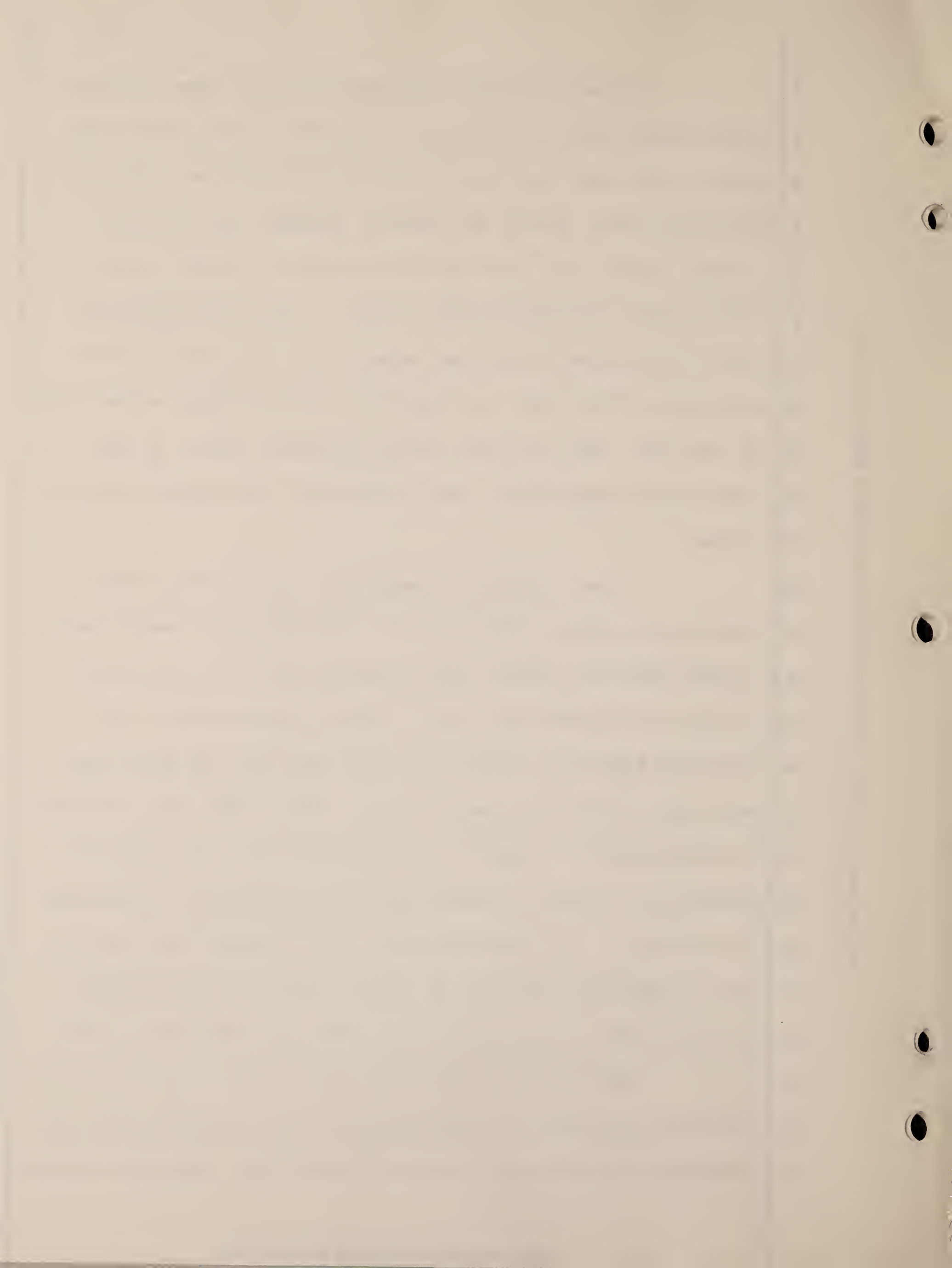
17 MR. MILLER: Mr. Chairman, members of the panel,
18 ladies and gentlemen, my name is Blaine Miller. I'm an
19 employee of the Gulf Oil Corporation and executive vice-
20 president of the Rio Blanco Oil Shale Project.

21 Earlier Mr. Walter Herget, president of the project
22 summarized our Detailed Development Plan for you. I would
23 now like to take just a few minutes to address some of the
24 more important issues that have been raised in the past and,
25 indeed, some of them have been brought up again today.

1 Concern has been expressed that our plan calls for
2 some actions that are illegal. Specific reference has been
3 made to off-tract ~~plant~~ siting and off-tract disposal.
4 Off-tract plant siting and process disposal are no more
5 illegal action than are the construction of roads, pipe
6 lines, power and communication lines, the construction of
7 homes on BLM land adjoining Rangely, the construction and
8 operation of our plant and numerous other actions called for
9 in the DDP. Some of these actions require rights of way.
10 Some require approvals, some permits and some require legis-
11 lation.

12 We are currently compiling a list of the various
13 permits, et cetera, that will be required, but I would hazard
14 a guess that the number would approach 100. If we were to
15 attempt to proceed with any of these actions without the
16 required approvals, permits or what have you, we would most
17 certainly be taking illegal action. We do feel that it would
18 be unreasonable to expect us to have all of these approvals,
19 permits, et cetera, in hand before our program is considered
20 for approval. In point of fact, it is likely that many of
21 these approvals, permits, et cetera, will be unobtainable
22 until our plan is approved by the Area Oil Shale Supervisor.

23 The DDP being considered here today is a product of
24 two years of intensive engineering and environmental work and
25 represents expenditures of some \$18,000,000. Numerous alterna-



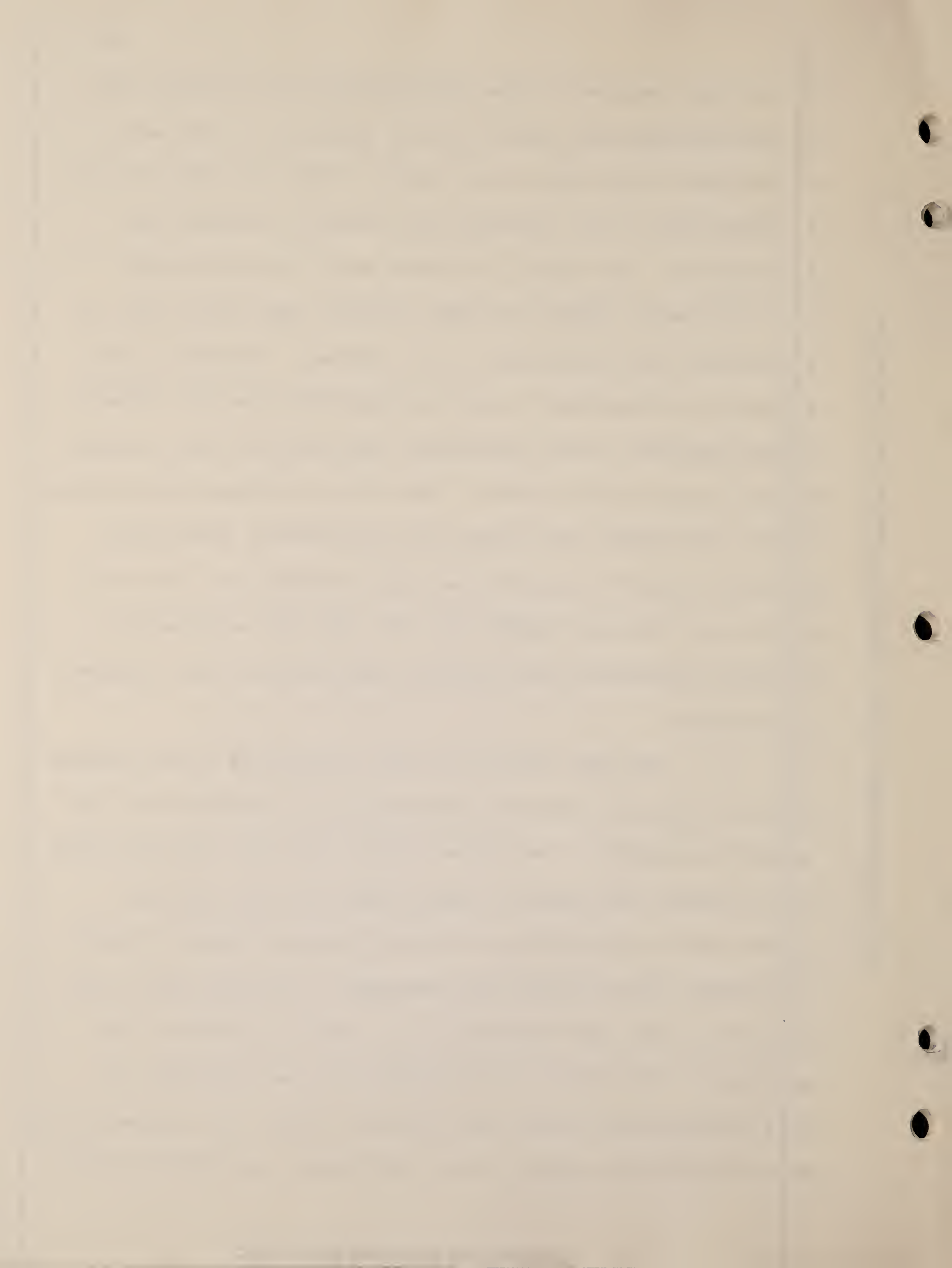
1 tives were considered in every area of planned activity and
2 later discarded for good and valid reasons. The resulting
3 plan is what we believe to be the optimum development plan
4 for Tract C-a, optimum from the viewpoint of resource con-
5 servation, environmental protection, technology and economics.
6 We cannot ignore what we have learned over the past two
7 years and rationalize the submission of a plan that is in-
8 ferior in any of these areas simply to avoid the necessary
9 for approvals, permits or legislations.

10 Criticism has been leveled at others to the effect
11 that their plans are too generalized and not sufficiently
12 specific. We do not feel that this criticism can be justi-
13 fied with regard to Tract C-a DDP and we now find that these
14 same critics are accusing us of producing a plan that is too
15 specific and insufficiently generalized. Just as we are
16 firmly convinced that this is the best possible plan for
17 development of Tract C-a, we are equally certain that we can
18 convince the various local, state and federal agencies and,
19 indeed, the Congress of the United States of this fact.

20 Under these conditions, it is unreasonable to be-
21 lieve that required approvals, permits and legislation will
22 not be made available. Bills are currently being considered
23 before both Houses of Congress that will authorize the
24 Secretary of the Interior to issue leases for off-tract plant
25 s i t i n g and plant shale disposal and far from being dead,

1 the House version of this authorization bill is being con-
2 sidered before the House Interior committee in hearings on
3 the 21st to the 29th of this month. There are those who be-
4 lieve that s i t e specific EIS should be required for
5 Tract C-a. The federal prototype shale leasing program
6 environmental impact statement requires some three years to
7 generate and was produced in six volumes. Although a great
8 deal of information has been accumulated since this document
9 was produced, we are continually impressed with the accuracy
10 and insight of the drafts. Each of the prototype lease tracts
11 was considered, was treated with considerable detail and
12 with respect to Tract C-a, we can truthfully say there are
13 far more detailed studies and they have not revealed any
14 major departures from conditions envisioned by that original
15 document.

16 . The Rio Blanco Oil Shale Project DDP is the product
17 of two years of intensive engineering and environmental im-
18 pact assessment. The document deals with each and every area
19 of concern that would be appropriate to a site specific
20 EIS and in considerably more detail than we believe would be
21 possible in the normal EIS procedure. We would like to em-
22 phasize that this document is not simply a product of Rio
23 Blanco's efforts but is the product of the continuous re-
24 fining process wherein the comments, advice and recommendations
25 of the various aspects of the OSEAP panel, the AOSS, the BLM



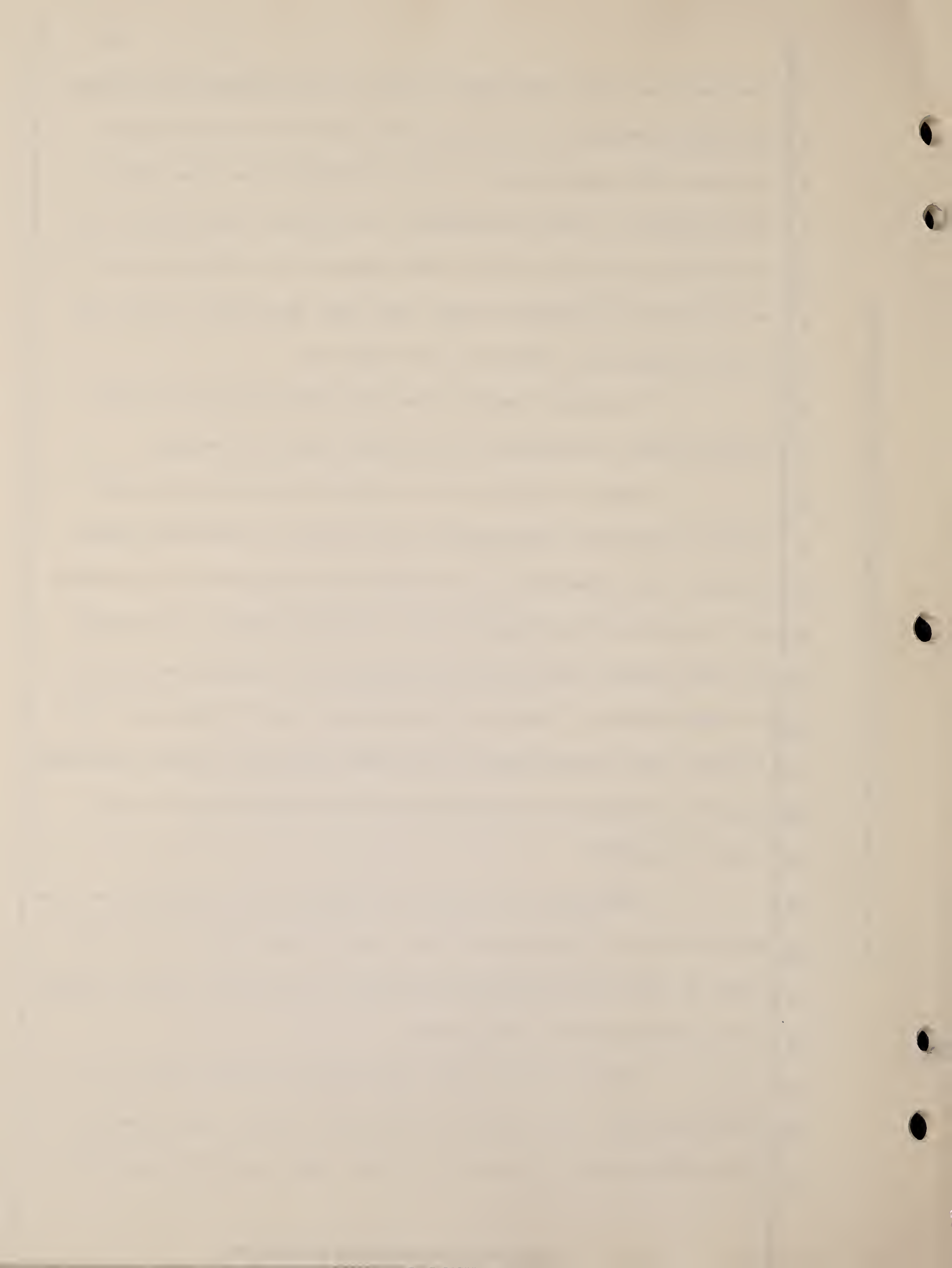
1 and various other government agencies was appropriated into
2 the final product. We firmly believe that the prototype
3 program EIS supplemented by the detailed base line data,
4 environmental impact assessment, mitigating procedures and
5 monitoring programs of our DDP represent as comprehensive an
6 environmental program as has ever been produced, which has
7 ever preceded an industrial development.

8 We firmly believe that the duplication of this
9 effort would be wasteful of valuable time and money.

10 Next, I would like to address briefly the DARE
11 report which was represented our efforts to make as compre-
12 hensive and objective an environmental assessment as possible
13 of 16 potential processed shale disposal sites. As stated
14 in this report, the process requires the subjective opinion
15 of individuals. However, the opinions of 19 different indi-
16 viduals were independently recorded and their system included
17 several mathematical manipulations to remove bias to the
18 extent possible.

19 Opponents of off-tract disposal have questioned the
20 objectivity of this report but, to my knowledge, no one has
21 come up with an alternative study or conclusion which refutes
22 the finding of our evaluation.

23 Next, I would like to address briefly the SO₂ re-
24 quirements for the state of Colorado. These requirements
25 were promulgated in January of this year whereby standards



1 were set for three categories. At that time there were desig-
2 nated areas within the state that were designated as Category
3 3 and the remainder of the state was designated as Category 1
4 with the expectation that applications for change of category
5 would be made as needed and that they would be granted or re-
6 fused on the merits of the case.

7 One other subject I would like to address is back-
8 filling and that was mentioned earlier in the proceedings
9 here, concern that our DDP called for backfilling into the
10 open pit to take place in about 30 years whereas the Environ-
11 mental Impact Statement mentioned at a period of about 15
12 years. This came up on the OSEAP panel. It was discussed in
13 detail and we pointed up the thrust would always be towards
14 starting backfilling as early as possible, both economically
15 and environmentally. The 30-year period was felt to be a
16 reasonable time. We could do it much earlier if we possibly
17 could consistent with safety and the workings of the pit.

18 Ms. Wendt, I think, mentioned wild horses, the pro-
19 tection of wild horses. We feel that our revegetation and
20 wildlife management schemes do an adequate job of this, but
21 I could assure her and others that we are going to do every-
22 thing we possibly can to protect these animals because I, for
23 one, am convinced that if we don't find some way to cut some
24 of the red tape and the internal delays in the installation
25 that has slowed and resulted in cancellation of some major

1 interim projects in this country, that we are going to need
2 those horses to ride, and I was going to say to ride to work
3 but I feel also that if something doesn't happen pretty soon
4 there are going to be large segments of our society that
5 aren't going to have any jobs to ride to.

6 Finally, Mr. Chairman, I would like to express our
7 appreciation to you and to the other members of this hearing
8 panel to the opportunity to make these comments.

9 Particularly, we would like to express our most
10 sincere appreciation to the Area Oil Shale Supervisor and his
11 staff, the members of the Oil Shale Environmental Advisory
12 Panel and the various state and federal regulatory agency
13 personnel who spent many, many hours reviewing the several
14 drafts that preceded our final DDP document. Without the
15 fine spirit of cooperation that existed throughout this pro-
16 cedure and without the constructive comments and advice of all
17 these individuals, we simply could not have produced this
18 Detailed Development Plan which we now feel is fully accept-
19 able.

20 Thank you very much.

21 MR. RICHARDS: Thank you, Mr. Miller.

22 Any questions or comments from the panel?

23 (No response.)

24 MR. RICHARDS: Are there any other persons here
25 that wish to testify at this time?

1 (No response.)

2 MR. RICHARDS: Seeing none, we will adjourn until
3 7 p.m. this evening here in this room. We don't have any
4 other witnesses scheduled but pursuant to our advertisement
5 in the Federal Register, we will convene at 7 p.m. to take
6 any further witnesses who may wish to testify.

7 Thank you.

8 (A short recess was taken.)

9 MR. RICHARDS: Being the hour of 7 o'clock, these
10 hearings are hereby resumed.

11 Do we have any people who wish to give testimony
12 on Tract C-a?

13 (No response.)

14 MR. RICHARDS: Then these hearings are adjourned.
15 The record is open until June 25th for written comments.

16 (Whereupon, at 7:01 o'clock p.m., the hearing was
17 closed.)

CERTIFICATE OF REPORTER

UNITED STATES DEPARTMENT OF INTERIOR

This is to certify that the attached proceedings
before the Geological Survey, Conservation Division
In the Matter of:

Office of the Area Oil Shale
Hearings on the Detailed De-
velopment Plan for Tract C-a

Denver, Colorado

June 10, 1976

were held as therein appears, and that this is the
Original Transcript thereof for the files of the
Department of Interior.

Karl Fischer

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